IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

*e*PLUS INC.,	)	
	)	
Plaintiff,	)	**Civil Action No. 3:09-CV-620 (REP)**
	)	
v.	)	
	)	
LAWSON SOFTWARE, INC.,	)	
	)	
	)	
	)	
Defendant.	)	

**PLAINTIFF *e*PLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND
REVISED SUMMARY OF THE DEPOSITION OF TODD DOONER,
TAKEN MARCH 1, 2010**

Defendant's Counter Designations	*e*Plus's Objections to Defendant's Counter Designations	Plaintiff's Counter-Counter Designations
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PLAINTIFF *e*PLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND REVISED SUMMARY OF THE DEPOSITION OF TODD DOONER, TAKEN MARCH 2, 2010

Defendant's Counter Designations	*e*Plus's Objections to Defendant's Counter Designations	Plaintiff's Counter-Counter Designations
312:9-20		
315:4-5; 315:11-12; 316:14-16		315:9-10
333:22-334:5	V (as to "map")	
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Revised Summary Todd Dooner – Personal Deposition

At the time of his deposition, Todd Dooner was a senior software engineer for Lawson Software. (22:1-4) His responsibilities in this role were to develop and maintain the Requisitions Self-Service ("RSS") Application. (22:5-8)

The purpose of the RSS application is to allow people to order items they may need for either their day-to-day use or for their business's use. (23:2-7) The system can be set up so that different requesters can have different access rights as far as what they may requisition. Using the RSS application, there are different methods by which they may find particular items that they wish to order. (23:8-10; 23:14-22) One method is by conducting a search through the catalog of items by keyword or by category. (24:1-8) Another method is manually inputting the particular item details into the system. (24:1-8; 48:7-12) To Mr. Dooner's knowledge, the PO13 vendor item program does not provide a list of all items available from a particular vendor. (47:22-48:6) P013 can be run to view vendor item information associated with a particular item. (53:20-22) Another method is viewing items that are on a template or a predefined shopping list. (24:1-8) A user of RSS could also use a combination of the express order screen and the item number. (24:1-8) Another method is punch-out. (24:1-8)

The end result of using the RSS application is a requisition. A requisition is then processed to create one or more purchase orders. (25:10-17) A purchase order is created by a computerized batch process or a non-computerized human-interaction process. (26:5-11) To generate a purchase order from a requisition, there is certain minimum data required, but vendor name and item description are not necessary pieces of data. The batch process can be either manually run or automatically run on a set schedule. (30:6-13) The batch process picks up those requisitions that have a status indicative of their readiness to be converted into purchase orders. (26:12-16) The database table that contains all the requisitions that are awaiting the next step of processing is called "PO Interface." (31:13-14) If a requisition has items that have been requisitioned from two or more vendors, multiple purchase orders would be generated from the processed requisition that correspond to the number of different vendors having items in the processed requisition. (31:20-32:14)

In the RSS application, a keyword search is conducted by the source code's execution of a search of keyword tables that are used as indices to point to particular item data records inside the RSS application's database of items, called the Item Master. (34:3-8; 34:18-21; 37:9-15; 38:7-19) Keywords are indexed by using a set up screen, which allows the user to pick which fileds to index, but no one field is indexed by default. Multiple keywords can be input for a search query. (41:11-13) When using the advanced search functionality of the RSS system, a user can input certain keywords that he wants excluded from the search results – so any items matching the excluded keyword will not be returned as search results. (45:21-46:5) The advanced search functionality is not enabled by default, but to enable it an entry in the configuration line must be changed. Advanced search operates on those fields defined by ICO5. Advanced search allows the user to specify a keyword to be ignored in a search, and if no ignore word is specified, advanced search is just like a normal keyword search. (85:1-12). (45:11-20)

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Only certain item attributes can be indexed in RSS and made keyword searchable – those attributes include the item number and the item description. (35:11-17; 65:13-15; 64:19-22) In addition, a user of the RSS system may define his own "user defined fields" that may be indexed. (46:12-14; 47:9-21) When a particular keyword is entered by the user desiring to perform a keyword search into the RSS application, the source code would read the keyword tables searching for a match. (38:7-19) If the entered keyword is matched to a keyword listed in the index, the source code would be directed to the item master and would retrieve the details of all items that the keyword index had listed as being associated with that particular keyword. (38:7-19)

To Mr. Dooner's knowledge, users cannot search by vendor item to locate an item from a particular vendor. (48:16-19) The Lawson RSS application has a sub-routine called IC800 – Keyword Search Load. (49:11-50:1; 83:15-84:8) This sub-routine is used to build the keyword index table and populate it with the index keys and pointers. (49:11-50:1; 83:15-84:8) The program builds the keyword index table based on the fields that the user has selected to be searchable by a keyword search. (49:11-50:1; 83:15-84:8) The keyword index does not map to particular items. (333:22-334:5) An index is a key or path to the data – it returns the data in a particular order based on its keys. (292:6-10)

In the Lawson system, there is a relationship between the items listed in the Item Master table and the items listed in the Vendor Item table by Item Master number – as this number is present for each item in the Item Master and in the Vendor Item tables. The system can search by vendor item and that data is indexed when the Keyword Search Load sub-routine IC800 is run. (49:18-50:1; 52:3-53:2; 53:10-15) There is no data in the Item Master by default; it is all provided by the client. (50:6-10) Vendor information cannot be added as field to the Item Master. (54:1-3) The Item Master in the Inventory Control application cannot include data relating to at least two product catalogs. (240:20-241:2)[1] Vendor item data could not be loaded into the Item Master in the Inventory Control application. (241:11-14)

The program PO536 loads vendor agreements into the system. Vendor agreements are agreements between a Lawson user and a particular vendor with whom that user has negotiated prices and items to purchase from that vendor. When PO536 is run, the vendor agreement information is loaded into the system. The data loaded includes item descriptions, and the information also includes units of measure for the particular items, and the cost of those items. (138:14-141:1)

There are conversion and interface programs included with the S3 procurement applications. The purpose behind these applications is to take data from a legacy system and import it into the Lawson system. These conversion programs would be used when a customer is moving from a legacy system into Lawson. The conversion programs would not take the data from the legacy system item master and convert it to the proper format for importing the data into the Lawson Item Master. (147:11-17) Lawson provides file format layouts to assist in the conversion process. What was used to put the legacy system data into the format for the Lawson system was

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[1] *e*Plus objects to the inclusion of this sentence on the grounds that the question was vague as to the word "catalogs."

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up to the client; Lawson did not provide a tool to assist the client in putting the data into the format the Lawson system expects. (148:2-10) Clients approach data conversion in one of two ways. The first is for the client to utilize Lawson's application program interfaces and upload the data from a CSV file. This approach requires the extraction of data from the legacy system and conversion of the data to Lawson's format. The second approach is for the client to utilize Lawson's process-flow integrator BL tool and Microsoft add-ins. Certain application-programmer interface routines come with the Lawson Procurement applications as delivered to the customer. One example of one such API is IC11 for the item master. (146:14-147:10; 147:18-148:1; 148:11-149:20)

Mr. Dooner authenticated a document titled "RSS XML 8.1.0.51 and RSS XML 9.0.0.2 Academy." (LE00120322-364) This document was provided at a class at a "customer user exchange" or "CUE" meeting that was attended by Lawson's customers. On a page of this document with the last 3 digits of the Bates number 333, a RSS form is shown, and on the right-hand side is a depiction of the shopping cart user interface. The document explains that upon checkout, the items placed by the user in the shopping cart are saved to the database, the cart is emptied, and a requisition with those items is released. (68:3-21; 80:19-81:20)

Mr. Dooner authenticated a document entitled "P11 Requisitions Self-Service: What's New in Version 8.0.3." (LE02761084-113) This document was from a presentation that Mr. Dooner gave at a CUE meeting in April 2004. On page 1095 of this document, the Keyword Search Setup IC00.5 screen was shown, and this IC00.5 sub-routine is where the user would define the keywords against which a search may be run within RSS. There are at least two alphabetical character user-defined fields that can be used to set up additional item attributes to make previously undefined information keyword searchable. On page 1097 of this document, the Keyword Search Load IC800 is described. This IC800 sub-routine will build the keyword tables based on the designated keyword fields that the user chose. These keyword tables are the indexes that have references back to the particular item records in the item master. On page 1098 of this document, the UNSPSC Product Codes IC16.1 sub-routine is described, which is used to define UNSPSC codes. UNSPSC codes may also be loaded with the IC816 utility. Page 1099 describes the Item Master IC11.1 sub-routine that is used to define the particular items – one portion of the IC11.1 screen, "Item Code" is used to define the UNSPSC codes that the user desires to associate with the particular item that he is entering into the Item Master. These UNSPSC codes must already be defined within the system, however, and this definition is done by using the IC16.1 subroutine. (93:10-94:11; 102:5-103:7; 103:20-106:15)

Mr. Dooner authenticated a document entitled "Application Design Document for S3 Item Search Center." (LE00192055-2062) An application design document is used to outline a particular feature enhancement. On the page with the bates number ending in 60 of this document, the document explains that "The S3 Item Search Center adds the capability to search for item information within the item master (ITEMMAST table), item location (ITEMLOC table), and vendor item (POITEMVEN table)." The table listed on this page are the database tables that the search engine will conduct a search against when searching for items. (107:19-108:1; 108:9-17; 121:22-122:12)

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Mr. Dooner authenticated a document entitled "Lawson Requisitions Self-Service Installation Guide." (LE03258750-766) The purpose of this document is to aid a client in installing RSS. Lawson also provides services that can be purchased to assist its clients in connection with the installation of RSS. The installation guide has a step-by-step description of the process that a client would use to go about installing the Requisition Self-Service application. (154:7-22; 155:22-156:4; 156:8-12)

Mr. Dooner authenticated a document entitled "Requisitions File Layouts." (L0060405) These file layouts are used for a reference to enable a user to use the programs listed therein to import data. A user would use these programs if they want to interface data into the system via a batch process. These file layouts are made available to Lawson's clients of the particular software suites. One example of a file layout given by Lawson to its customers is for use with the Lawson Requisitions application. These file layouts are used to organize data that is to be imported into the system. (158:1-11; 158:17-159:5; 159:21-160:3; 162:10-163:14)

Mr. Dooner authenticated a document entitled "Purchase Order File Layouts" that describes the file layouts for purchase orders. (L0043347)   PO122 comes with the purchase order application as delivered. On page 34 of this document, and pages following it are the file layouts for the vendor price agreement PO536. This file layout is used to load vendor item data into the item master. (165:6-166:10; 167:17-168:1; 168:17-170:6)

Mr. Dooner authenticated a document entitled "Lawson Supply Chain Management Conversion Guide." (LE02511014-175) Conversion guides are used when converting from a non-Lawson system to a Lawson system and are provided to Lawson's customers. Inventory control data can be converted from a non-Lawson system to the format required for the Lawson Inventory Control application. One type of data that can be converted is item master records. In the section of this document that follows the heading "Item Master Records," the minimum data that is required to populate the individual records is described. This minimum data includes item group, item description, and stock unit of measure. These pieces of information are required by the Lawson Item Master.   The page of this document with the bates number ending in 57 is titled "Load Inventory Control Conversion Data." The suggested Lawson core technology utility for loading CSV files is importDB, which is a utility that is supplied with Lawson System Foundation. The create header file feature used to create CSV files does not come with Requisitions as delivered. (160:4-11) (160:17:161:7; 161:11-20. The importDB utility reads a CSV file and attempts to load it into the designated Lawson database table. On the page with the bates number ending 143, the document describes that conversion file layouts are found in Lawson's online documentation center. (175:7-176:3; 176:8-178:4; 180:3-181:16; 183:5-184:9)

Mr. Dooner authenticated a document entitled "System Utilities Reference Guide." (LE00394180-308) The purpose of this guide is to describe for Lawson customers the available utilities and the purposes of those utilities. These utilities are part of the Lawson applications as delivered – part of the system foundation level of Lawson. Page 62 of this document references a utility "import and export file." This utility allows a user to import data into the Lawson database table. The utility importDB is also described in this document. (184:10-185:9; 188:18-190:6)

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The Keyword Search Load program is used to build the search index based upon the keyword origin fields that have been enabled for keyword searching. A processing effect of this program is that all of the records in the ITEMMAST, POITEMVEN, ITEMUPN1, ITEMUPN2, ITEMUPC, ITEMSKU, and ICUSRFLDEF tables are indexed. (200:18-201:10)

The Load UNSPSC Product Codes IC516 program is used to import a CSV file of codes that can be attached to the item master records to create an item hierarchy. This program comes with the application as delivered. Once the codes are loaded, another program is used to associate the codes with each item in the Item Master. The category search task in the RSS application is linked to these UNSPSC codes. The IC811 program comes with the Inventory Control application as delivered and can be used to import item master data into the system. (201:11-202:17; 203:12-204:10)

The Transmitted PO Acknowledgement PO122 program is used to update purchase order acknowledgement sent by vendors via electronic data interchange, or EDI. (207:7-208:8) A client would need to have an EDI application to use the Transmitted PO Acknowledgement functionality. (168:5-9)

The Purchase Order interface PO100 is used to update the purchase order application with ordering information from the inventory control requisition and order entry applications. The PO100 program creates purchase orders from the purchase order interface file. Purchase orders can be set up to be automatically released. (210:2-210:19)

Mr. Dooner authenticated a document entitled "Requisitions Self-Service 8.1, 9.0" (LE02932685-765) that was given to attendees at a CUE presentation. Searching the catalog will search for items in the item master and in the vendor item table. In the vendor item table, the vendor item number and vendor item description are indexed for searching. UNSPSC data may be populated using either IC16 or IC516, with IC16 being an online transaction and IC516 being a batch process. Once a requisition is released, it may go into an approval process. However, if an approval process is used, and the requisition is subsequently approved, the requisition is processed by the PO Interface program. This document explains that keywords exist because a user can enable certain fields as searchable in IC00.5 and IC800 is used to build keywords from these fields. These fields come from fields in the files ITEMMAST, which is IC11; ITEMLOC, which is IC12, and/or POVENITEM, PO13. (211:21-212:9; 212:17-213:21; 215:10-218:3)

Mr. Dooner authenticated a document entitled "Lawson Procurement Punchout Installation Guide" (L0234779-810) This document is for version 9.0.0.x and its purpose is to aid a user in installing the Procurement Punchout application. A user may hire Lawson professional services for assistance in installing particular applications. (218:16-219:5; 219:9-11; 220:1-7)

Mr. Dooner testified that Lawson's Requisition application has the ability to build requisitions for desired items. He also testified that Lawson's Requisition application has the ability to conduct searches for items that match a search query. The Requisition application can also use the data resulting from a search to build a requisition. The application can also generate purchase orders for multiple vendors from a requisition if the requisition contains orders from multiple vendors. (239:2-5; 239:14-17; 239:20-240:18)

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Revised Summary Todd Dooner – Corporate Deposition

Mr. Dooner was also Lawson's corporate designee with respect to the source code of the Lawson S3 application. Mr. Dooner considers himself to be the most knowledgeable person at Lawson with respect to Requisitions Self Service. (250:14-254:15; 254:20-255:14)

In the S3 application, when the user inputs a search keyword and hits enter or presses the search button, the source code passes the keyword off to a Lawson 4GL program that performs the search. There is JavaScript code that passes the keyword to the Lawson 4GL program. (272:17-273:8)

Program IC11 enabled typing in information into the Item Master. (293:21-294:8) Besides manual entry of item information, Lawson provides import programs to input item data information into the Lawson S3 procurement system. These programs consume a comma-separated value ("CSV") file and populate the database. The IC811program is an example of an import program that reads a CSV file and creates database records from that file. A user directs the IC811 program to a particular location where it would find the CSV file. Based on the data in the CSV file, the IC811 program creates item master records. The CSV file is formatted according to a certain order of fields, which order is determined by Lawson. (294:9-295:4; 295:19-296:21)

Mr. Dooner authenticated a document that bears the bates numbers L0030197.001 to 30197.052. This document explains what the CSV file format is that the IC811 file expects. (299:17-298:21)

Mr. Dooner authenticated a document that bears the bates numbers LE02388390-669, entitled "Doc for Developers, Lawson 4GL Application Program Interfaces." This document is a reference manual for developers identifying available application program interfaces for use in developing a program. A Lawson programmer uses this document as a reference manual and it is available through the documentation interface, which is a document system from where clients can download documentation. This document describes the function and operation of Lawson API routines, such as 840-FIND-INDEX and 850-FIND-BEGRNG-<INDEX>. (284:16-287:12; 288:7-16; 289:2-11; 289:17-290:14; 292:11-14) The document is provided to clients to make modifications to the source code. (287:13-20) Clients routinely make such modifications. (287:13-20) An index is a key or path to the data, and it returns the data in a particular order. (292:6-10)

Requisition Self-Service is a stand alone application, (312:9-20) Mr. Dooner testified that it is possible to search by keyword in the RSS module. After a user types a particular keyword into the keyword search box and then hits search, a Lawson 4GL application is initiated that performs database access to try to match the keyword entered within the search box to those keywords stored within that database table. A match will be only a whole keyword, not a partial keyword. If a user wanted to search for red items, the user would have to type "red" and not "re." The fields that are searched are chosen by the user during system implementation. (313:2-314:17)

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Price information is stored in the database. (315:6-8) A user cannot search by price. (315:4-5)
Price information is not stored in the Item Master or the vendor item table, but it is stored in
multiple other places in the database. (315:9-12; 316:14-16)

The name of the Lawson 4GL routine that executes for a keyword search is called RQIC. The
search string is passed to the RQIC routine via an HTTP request as a parameter delimited string.
The string is passed into the S3 application's environment layer, which initiates the 4GL
program. (316:17-317:3; 317:8-19)

The RQIC routine searches the database using canned IOS routines that are provided as part of
the 4GL environment to access and read the database. RQIC basically uses a COBOL
programming language string comparison routine to see if the values in the database are equal to
the string being searched for. If a match is found, the item master information for those matches
are gathered, and an output file is generated that is later consumed by other parts of the S3
application. (318:5-17)

The Lawson System Foundation accepts the search string itself from the HTTP layer. LSF, then,
launches the RQIC program by populating the screen fields of the RQIC program, one of which
is the search string. Once the keyword is passed into the RQIC program, the 2000-move-to-
object routine is executed. The 850-FIND-BEGRNG-ICKSET1 routine of RQIC is actually
searching the database for the keyword, and this routine searches a database index, and not the
entire database. The result of a matched keyword is a pointer into a set of matching results.
When results are located, RQIC generates an XML output file that the RSS application consumes
and formats for the user to view in the search results area. (319:17-320:3; 320:19-321:16; 325:1-
18; 326:3-17; 327:19-329:19; 330:2-333:6)

A database index is a set of fields that define access to various records within that database. The
indexes are set up with key fields that allow a user to access the indexed data. The index keys
are predefined – they are set by Lawson or they are set by the programmer or an analyst or a
developer. (339:17-340:4; 341:6-10)

The 850-FIND-BEGRNG routine uses ICKSET1 as a database index. (336:1-13; 336:18-20)

The keyword detail index maps back to particular items in the item master. (345:5-7) It is not
possible to do additional keyword searches only on results from a previous search. (345:21-
346:6)

RQIC.scr, RQICWS, and RQICPD are components that make up pieces of the RQIC program.
PD stands for "procedure division." SCR stands for "screen." WS stands for "working storage."
The "SCR" "WS" and "PD" files are interpreted at compile-time to generate a compiled object
that is executed. (323:2-22)

A user may search for items in the RSS application by drilling down into different categories.
When the doCategoryItem routine executes, a list of items for within a particular selected
category is returned. The doCategoryItem routine calls the RQIC program to return a list of
items that match a particular category based on the UNSPSC segment, class and commodity

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codes. The doCategory function in the shoppingreturns.js file displays the available categories that may be traversed through according to the UNSPSC codes that have been defined. If a user clicks on the highest possible category, the doCategory function will display the subcategories within that category that are available to be selected next. (348:2-5; 355:4-7; 355:12-18; 356:4-13)

Once particular items have been selected by the user, a requisition is created from the items that have already been selected by making a transaction call through the LSF layer (the environment layer) to another 4GL program that will process them and add them to the database. The 4GL program involved in this step is RQIF. The RQIF program creates ReqLine records in a particular database table, these records being the individual lines of a particular requisition. When the checkout button is pressed, RQIF understands this as a release function, which signifies that the requisition is finished being created, and is ready to be sent for further processing. (359:4-16; 367:14-368:22)

The PO100 program and the PO23 program can be involved in converting POINTERFAC records into actual purchase orders. PO100 works by consuming POINTERFAC records and eventually creates a purchase order header for each purchase order that is generated from the POINTERFAC records. If a requisition consists of items from different vendors, the PO100 logic produces one purchase order for each different vendor. It does this by creating multiple purchase order header records and then attaching the appropriate line records to the header for each vendor. In PO100, the first place POINTERFAC records are read is the 1000-SEL-REPORT sub-routine. (369:10-378:8; 370:14-17; 372:1-4; 376:14-377:3; 377:7-15) PO100 does not review the requisition line entries. (377:4-5)

There are no 4GL routines involved in shopping at a punchout vendor; a user is on a vendor's site once he beings the shopping process and is outside of Lawson. (380:21-381:4) If a user were to select a particular item at a punchout vendor, it would be sent back to the Lawson system and would show up in RSS as a requisition line item just like normal, and would be processed in the same fashion as a non-punchout item. (387:5-19)

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Dooner, Todd -Vol. 1, VGA 3/1/2010 12:00:00 AM

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1   THE UNITED STATES DISTRICT COURT

2   FOR THE EASTERN DISTRICT OF VIRGINIA

3   Richmond Division

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6   ePLUS INC.,   )   Civil Action

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7   Plaintiff,   )   No. 3:09-CV-620 (JRS)

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8   vs.   )

.   )

9   LAWSON SOFTWARE, INC.,)

.   )

10   Defendant.   )

.   _____)

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12   C O N F I D E N T I A L

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14   Videotaped Deposition of TODD DOONER

15   Individually and as Corporate Designee of

16   LAWSON SOFTWARE, INC.

17   Washington, D.C.

18   Monday, March 1, 2010

19   9:28 a.m.

20   Job No.: 1-174253

21   Pages: 1 - 305, Volume 1

22   Reported by: John L. Harmonson, RPR

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3   Videotaped Deposition of TODD DOONER

4   Individually and as Corporate Designee of

5   LAWSON SOFTWARE, INC.

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9   Held at the offices of:

10   GOODWIN PROCTER, LLP

11   901 New York Avenue, N.W.

12   Washington, D.C. 20001

13   (202) 346-4000

14

15

16   Taken pursuant to the Federal Rules of Civil

17   Procedure, before John L. Harmonson, Registered

18   Professional Reporter, Notary Public in and for the

19   District of Columbia, who officiated in administering

20   the oath to the witness.

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20   AKIM GRAHAM, Videographer

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22

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P R O C E E D I N G S

THE VIDEOGRAPHER: Here begins Videotape No. 1 in the deposition of Todd Dooner, in the matter of ePlus, Inc. v. Lawson Software, Inc., in the United States District Court for the Eastern District of Virginia, Richmond Division, Civil Action No. 3:09-CV-620 (JRS).

Today's date is March 1st, 2010. The time on the video monitor is 9:29 a.m., and the video operator today is Akim Graham.

This video deposition is taking place at Goodwin Procter at 901 New York Avenue, Northwest, in Washington, D.C.

Counsel, please voice-identify yourselves and state whom you represent.

MS. ALBERT: Jennifer Albert with the law firm of Goodwin Procter representing the plaintiff ePlus, Inc.

MR. SCHULTZ: William Schultz of Merchant & Gould representing Lawson Software, Inc.

THE VIDEOGRAPHER: The court reporter today is John Harmonson of Merrill/LAD.

8

Would the reporter please swear in the witness.

TODD DOONER,

after having been first duly sworn, was examined and did testify under oath as follows:

EXAMINATION

BY MS. ALBERT:

Q.   Mr. Dooner, can you provide your full name, residence address and business address for the record, please.

A.   Todd Michael Dooner, 1117 139th Lane, Hanover, Minnesota, 55304, and I'm employed at Lawson Software in St. Paul, Minnesota.

Q.   What's the business address?

A.   I believe it's 302 St. Peter Street.

Q.   My name is Jennifer Albert, and I represent the plaintiff ePlus, Inc. in this matter.

Mr. Dooner, do you understand that your answers today are being given under oath and that you are under the same obligation as if you were in court to answer truthfully and completely?

9

1   A.   Yes.

2   Q.   If any of my questions today are

3 unclear, can you please let me know and I will try

4 to clarify them?

5   A.   Yes.

6   Q.   Will you do that?

7   A.   Yes.

8   Q.   If you need to take a break at any time,

9 please let me know. I may ask you to wait until I

10 finish a question, however.

11   A.   Sure.

12   Q.   Is that acceptable?

13   A.   Yes.

14   Q.   Are you taking any medication or drugs

15 that would affect your ability to answer my

16 questions truthfully and accurately?

17   A.   No.

18   Q.   Is there any reason that you feel that

19 you would not be able to give truthful and accurate

20 answers to my questions today?

21   A.   No.

22   Q.   Your counsel may object from time to

10

1 time, but unless your counsel specifically

2 instructs you not to answer one of my questions, I

3 expect you to answer my questions.

4   Do you understand?

5   A.   Yes.

6   Q.   The court reporter needs to take down

7 everything that we say today. He can't take down

8 nonverbal responses or shakes or nods of your head,

9 so you need to verbally respond to each of my

10 questions.

11   Do you understand?

12   A.   Yes.

13   Q.   Have you ever been deposed before?

14   A.   No.

15   Q.   Have you ever testified at a trial?

16   A.   No.

17   Q.   Have you ever testified in any type of

18 proceeding?

19   A.   No.

20   Q.   Have you ever provided testimony in the

21 form of a declaration or an affidavit?

22   A.   No.

11

1   (Exhibit 1 marked for identification and

2 attached hereto.)

3 BY MS. ALBERT:

4   Q.   I've had the court reporter mark as

5 Dooner Exhibit 1 a copy of Plaintiff ePlus's Notice

6 of Deposition of Todd Dooner.

7   Mr. Dooner, have you ever seen this

8 deposition notice before today?

9   A.   Yes.

10   Q.   And are you appearing here today

11 pursuant to this notice with the exception that the

12 date has been changed?

13   A.   Yes.

14   Q.   Did you meet with anyone in order to

15 prepare to testify today?

16   A.   Yes.

17   Q.   And with whom did you meet?

18   A.   Counsel, Will Schultz, Rachel Hughey,

19 Josh Graham. Discussed -- Met with various Lawson

20 employees just to enhance my background -- refresh

21 my background in some of the possible subjects.

22   Q.   With what employees did you meet?

12

1   A.   Dale Christopherson.

2   Q.   Anyone else?

3   A.   Not that I can recall, no.

4   Q.   When did your meeting with

5 Mr. Schultz -- Well, step back a minute.

6   Were all three attorneys that you named,

7 Mr. Schultz, Ms. Hughey and Mr. Graham present at

8 the same meeting?

9   A.   One particular time, yes.

10   Q.   How many times did you meet with counsel

11 in order to prepare for your deposition?

12   A.   Two. Twice.

13   Q.   When did the first meeting take place?

14   A.   It was two weeks prior to the first

15 notice, I believe. I don't remember the exact

16 date.

17   Q.   And were all three attorneys present at

18 that meeting?

19   A.   No.

20   Q.   Who was present at that meeting?

21   A.   Rachel Hughey.

22   Q.   How long did that meeting last?

13

1   A.   Approximately four hours.

2   Q.   Did you review any documents in the

3 course of that meeting?

4   A.   Yes.

5   Q.   Did those documents serve to refresh

6 your recollection regarding topics for your

7 testimony today?

8   A.   Yes.

9   Q.   Do you recall which documents you

10 reviewed?

11   A.   I do not.

12   Q.   Do you recall the nature of the subject

13 matter of the documents you reviewed?

14   A.   They were technical manuals, Lawson

15 technical manuals.

16   Q.   Were they technical manuals for specific

17 products?

18   A.   Yes.

19   Q.   For which specific products?

20   A.   I believe it was Requisitions

21 Self-Service and Purchase Order.

22   Q.   Any other manuals that you reviewed?

14

1   A.   Not on that occasion, no.

2   Q.   You said you had a second meeting with

3 Lawson counsel. When did that second meeting take

4 place?

5   A.   That was Friday -- the Friday

6 following -- prior to this date. The 26th, I

7 believe; February 26th.

8   Q.   And who was present at that meeting?

9   A.   Rachel Hughey, Josh Graham and Will

10 Schultz.

11   Q.   How long did that meeting last?

12   A.   Approximately three hours.

13   Q.   Did you review any documents over the

14 course of that meeting?

15   A.   Yes.

16   Q.   Did those documents serve to refresh

17 your recollection with regard to topics of your

18 testimony here today?

19   A.   Yes.

20   Q.   What documents did you review at that

21 second meeting?

22   A.   Again, technical manuals.

15

1   Q.   Any other documents?

2   A.   Not that I recall.

3   Q.   Were the technical manuals that you

4 reviewed at the second meeting any different from

5 the technical manuals that you reviewed in the

6 course of the first meeting with counsel?

7   A.   Yes.

8   Q.   What were the technical manuals that you

9 reviewed at your meeting on Friday?

10   A.   They were developer reference manuals.

11   Q.   Do you recall the names of the manuals?

12   A.   Not the exact names, but they were --

13 Developer Workbench was a title.

14   Q.   Did you review any other documents in

15 addition to these developer reference manuals?

16   A.   I believe I looked through Dale

17 Christopherson's transcripts.

18   Q.   When did your meeting with

19 Mr. Christopherson take place?

20   A.   It wasn't a meeting. It was just in the

21 course of day-to-day activity. We work 20 feet

22 away, so it's kind of in passing.

16

1   Q.   And what was the nature of your

2 discussion with Mr. Christopherson?

3   A.   Just the proceedings upcoming, that I

4 had never been deposed before --

5   Q.   Did you --

6   A.   -- just casual conversation.

7   Q.   Did you discuss any particular topics,

8 technical topics, with him in order to prepare for

9 your deposition?

10   A.   Nothing specific, no.

11   Q.   Did you review any of your own files or

12 documents in order to prepare for your deposition

13 today?

14   A.   No.

15   Q.   Did you do anything else in addition to

16 your two meetings with Lawson counsel and your

17 discussions with Mr. Christopherson and your review

18 of these various technical manuals in order to

19 prepare for your deposition?

20   A.   No.

21   Q.   Can you describe for me your educational

22 background starting after high school?

17

1   A.   I have a two-year vocational degree from

2   Minneapolis Technical Institute.

3   Q.   What's the nature of your two-year

4   vocational degree?

5   A.   It was a computer programming.

6   Q.   When did you receive that degree?

7   A.   1983.

8   Q.   Have you ever authored any technical

9   publications?

10   A.   No.

11   Q.   Are you the inventor on any patents?

12   A.   No.

13   Q.   What was your first employment position

14   after you completed your education?

15   A.   I worked for Sperry Univac.

16   Q.   What was your position?

17   A.   I believe the title was computer

18   operator.

19   Q.   During what time period were you

20   employed by Sperry Univac as a computer operator?

21   A.   I believe it was 1983 to 1989.

22   Q.   What were the nature of your

19

1   Q.   And the inventory control, is that an

2   application in the S3 Supply Chain Management

3   suite?

4   A.   No.

5   Q.   In what -- For what suite of products

6   was this inventory control application?

7   A.   It's not -- I interpreted your question

8   wrong, I think.

9   It is part of the S3. It's not a

10   program, it's a suite. It's not a single program.

11   I may have interpreted your question

12   wrong.

13   Q.   The inventory control is a suite of

14   programs?

15   A.   Yes.

16   Q.   Okay. And for what period of time did

17   you have responsibilities as an application

18   developer for the inventory control suite?

19   A.   I don't recall the exact time frame.

20   Probably -- I'm guessing three to five years.

21   Q.   And subsequent to your position as

22   application developer with responsibilities for the

18

1   responsibilities as computer operator?

2   A.   To process the nightly jobs that were

3   required.

4   Q.   Was there any particular programming

5   language that was used in that position?

6   A.   No.

7   Q.   Following your employment as a computer

8   operator with Sperry Univac, what was your next

9   employment position?

10   A.   That was at Lawson Software as an

11   application developer, I believe the title was.

12   Q.   So that -- You started with Lawson in

13   about the 1989 time frame?

14   A.   It was 1990.

15   Q.   And what were your responsibilities as

16   an application developer?

17   A.   To fix issues in the source code and

18   develop new features and enhancements.

19   Q.   Were there any particular applications

20   for which you had responsibilities?

21   A.   During -- When I started, it was

22   inventory control.

20

1   inventory control suite, what was your next

2   position at Lawson?

3   A.   I moved on to work on web applications.

4   Q.   Are there specific web applications for

5   which you had responsibilities?

6   A.   Initially, I was the project lead for a

7   group of developers working on a variety of

8   different web applications.

9   Q.   Can you recall any of the specific ones

10   of the web applications for which you had

11   responsibilities?

12   A.   I believe we started developing

13   Requisitions Self-Service. There was a vendor

14   Self-Service, Customer Self-Service. It was more

15   of an experimental phase at that point. Research

16   and development, more of the research side.

17   Q.   So in and around the 1995 time frame,

18   Lawson started developing the Requisitions

19   Self-Service application?

20   A.   I don't know specifically if that was

21   one of them, but we were -- we were developing a

22   suite of applications that we called the SEA apps,

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21

1 Self-Evident Applications. I don't recall the
2 exact time frame for Requisitions Self-Service.
3   Q. How long were you in the position as
4 project lead for these web applications?
5   A. Maybe a year; two at most.
6   Q. What was your next employment position
7 at Lawson?
8   A. It was back into the development role.
9   Q. So around what time frame would this be?
10   A. I would say the late '90s.
11   Q. And what were your responsibilities once
12 you went back into the development role in the late
13 1990s?
14   A. Product maintenance and development
15 again.
16   Q. Were there specific products or suites
17 of products for which you had responsibilities?
18   A. I believe I started focusing more on the
19 requisition side of things at that point.
20   Q. How long were you in that position?
21   A. I would still consider myself in that
22 position.

22

1   Q. So do you have a particular job title at
2 present?
3   A. Currently I'm a senior software
4 engineer.
5   Q. What are your responsibilities as senior
6 software engineer?
7   A. Develop and maintain the Requisitions
8 Self-Service application.
9   Q. Do you have any particular individuals
10 who report to you?
11   A. No.
12   Q. To whom do you report?
13   A. Dale Christopherson.
14   Q. Do you have any responsibilities for any
15 other applications in addition to the Requisitions
16 Self-Service application?
17   A. Not directly.
18   Q. Do you have responsibilities for other
19 applications in an indirect manner?
20   A. Yes.
21   Q. What would be those other applications?
22   A. Any that may need assistance. I mean,

23

1   it's...
2   Q. Can you describe for me at a high level
3 the functionality of the Requisitions Self-Service
4 application?
5   A. Its purpose is to allow people to order
6 items they may need for their either day-to-day use
7 or business.
8   Q. And are there different methods by which
9 they may find items that they wish to order?
10   A. Yes.
11   Q. What are those different means?
12   A. I'm not sure I fully understand your
13 question.
14   Q. Well, using the Requisitions
15 Self-Service application, are there different --
16 you said that the functionality was to allow people
17 to find items that they may need that they wish to
18 order.
19   Are there different methods within the
20 Requisitions Self-Service application to allow a
21 user to find items that they wish to order?
22   A. Yes.

24

1   Q. What are those different methods?
2   A. There's a search catalog. They may
3 manually input the item in special item. They can
4 view items that are on a template or predefined
5 shopping list. If they know the item, there is
6 something we call express order screen, the exact
7 item number. And we have a punchout option as
8 well. And one more is a category search.
9   Q. Are you familiar with the S3
10 Requisitions application?
11   A. Yes.
12   Q. What's the difference between the
13 Requisitions Self-Service application and the
14 Requisition application?
15   A. I mean, the Requisitions Self-Service is
16 a web-based application that -- it
17 basically sits -- it doesn't sit on top of it, but
18 side by side with the 4GL application, the idea
19 being that it allows the novice user the ability to
20 order supplies and items without having a broad
21 definite knowledge of how to use the 4GL
22 application.

25

1   Q.   And you referred to something called a

2   4GL application. What do you mean by that term?

3   A.   That is our -- It's a Lawson fourth

4   generation language that our business applications

5   are written in.

6   Q.   So when you were referring to the 4GL

7   application, were you referring to the Requisitions

8   application?

9   A.   Yes.

10   Q.   Now, when you were referring to the

11   Requisitions Self-Service application

12   functionality, you said that it enabled a user to

13   order items.

14   Is the end result of using the

15   Requisitions Self-Service application a requisition

16   or an order?

17   A.   It's a requisition.

18   Q.   What happens to a requisition that's

19   generated using the Requisition Self-Service

20   application once the user submits that?

21   A.   It depends on the business setup within

22   the Lawson applications.

26

1   Q.   In order to turn the requisition into a

2   purchase order, what would need to be done?

3   A.   From whose point of view? I mean, from

4   the user's point of view?

5   Q.   How does the -- How would the system go

6   about processing a requisition in order to generate

7   a purchase order?

8   A.   There are a couple of different ways

9   that could be accomplished. There is a batch

10   process and there's an online human interaction

11   process as well.

12   Q.   How does the batch process work?

13   A.   It picks up requisitions that are in a

14   state or that are -- in a state that can be turned

15   into purchase orders and goes through the necessary

16   steps to create the purchase order.

17   Q.   And what is the state that is required

18   in order to turn -- to have a requisition in the

19   proper state to be turned into a purchase order?

20   A.   Would you repeat that one more time?

21   I'm sorry.

22   Q.   You said that the application would pick

27

1   up a requisition that it was -- was in a state that

2   could be turned into a purchase order and then goes

3   through the necessary steps to turn it into a

4   purchase order.

5   What is the state that would be required

6   in order to turn a requisition into a purchase

7   order?

8   A.   The requisition must be released and

9   approved, if there is an approval process. And all

10   the necessary information has been supplied on that

11   requisition.

12   Q.   What information is needed to be

13   supplied on a requisition in order to have the

14   necessary information to generate a purchase order

15   from that requisition?

16   A.   I don't know all of the data. It

17   depends on the setup within the organization.

18   Q.   Is there certain minimum data that would

19   be required in order to generate a purchase order

20   from a requisition?

21   A.   Yes.

22   Q.   What is that minimum data?

28

1   A.   I don't know all of the data.

2   Q.   Would you need to have the vendor name?

3   A.   Under name? No.

4   Q.   Would you need to have an item

5   description?

6   A.   No.

7   Q.   An item identifier?

8   A.   Yes.

9   Q.   In order to process a requisition and

10   generate a purchase order, would the system need to

11   be integrated with a Purchase Order application?

12   A.   No.

13   Q.   So a system can generate a purchase

14   order from a requisition simply by having the

15   Requisition application?

16   A.   No.

17   Q.   What is needed in order to generate a

18   purchase order from a requisition?

19   A.   You would need -- well --

20   Q.   What software? I'm sorry.

21   A.   You would need purchase order software.

22   It wouldn't have to be Lawson software.

29

1   MS. ALBERT: Let's go off the record for

2   one second.

3   (Off-the-record discussion.)

4   THE VIDEOGRAPHER: We are going off the

5   record. The time is 9:56 a.m.

6   (A recess was then taken.)

7   THE VIDEOGRAPHER: We are back on the

8   record. The time is 9:57 a.m.

9   BY MS. ALBERT:

10   Q.   Assuming that a Lawson system included

11   the Requisition Self-Service application, the

12   Requisition application and the Lawson Purchase

13   Order application, how would the system go about

14   processing the requisition to generate a purchase

15   order?

16   A.   Again, that would be one of the two

17   methods I described earlier.

18   Q.   So assuming that you're using the batch

19   process, how would that Lawson system take the

20   requisition and generate a purchase order?

21   A.   I'm not sure I understand your question.

22   Q.   How does the Requisition data get

31

1   maintains the requisition data that's used by the

2   purchase order application to generate a purchase

3   order?

4   A.   Yes.

5   Q.   What database is that?

6   A.   There is not a given name to it.

7   It's --

8   Q.   Is there a particular table that

9   maintains requisition data that's used by the

10   purchase order application to generate a purchase

11   order?

12   A.   Repeat that. Sorry.

13   Q.   Is there a particular table that

14   maintains requisition data that's used by the

15   Purchase Order application to generate a purchase

16   order from a requisition?

17   A.   Yes.

18   Q.   What table is that?

19   A.   The PO interface table.

20   Q.   If a requisition has multiple line items

21   and one line item is to be ordered from the first

22   vendor and a second line item is to be ordered from

30

1   communicated from the requisition application to

2   the purchase order application?

3   A.   It's all part of the application suite

4   database that can be accessed by the purchase order

5   transaction.

6   Q.   So once a requisition is released and

7   approved, what would be the next step that would

8   be -- what would be the next step that would happen

9   in this batch process for processing the

10   requisition to generate a purchase order?

11   A.   A user would either manually start the

12   batch process or it could be on a scheduled run

13   time and the user would have to do nothing.

14   Q.   And if it was on a scheduled run time,

15   how does the system go about processing the

16   requisition data to generate a purchase order?

17   A.   It would read it from the database, read

18   the appropriate file, and then process it.

19   Q.   What database would it read the file

20   from?

21   A.   I'm not sure I understand.

22   Q.   Is there a particular database that

32

1   a second vendor, how does the -- how would the

2   Purchase Order application process that requisition

3   to generate purchase orders?

4   A.   The logic of the program would determine

5   whether to combine them or not under a single PO.

6   Q.   Would it be typical to combine line

7   items that are to be ordered from different vendors

8   on a single PO?

9   A.   No.

10   Q.   What would be -- What would typically

11   happen to process a requisition that had multiple

12   line items where items were to be ordered from

13   multiple different vendors?

14   A.   You would have multiple POs.

15   MS. ALBERT: Let me have the reporter

16   mark as Dooner Exhibit 2 a document bearing

17   production numbers ePlus 0621206 through 233.

18   (Exhibit 2 marked for identification and

19   attached hereto.)

20   BY MS. ALBERT:

21   Q.   Mr. Dooner, have you ever seen the

22   document that's been marked as Dooner Exhibit 2

33

1   prior to today?

2   A.   No, I have not.

3   Q.   Do you know whether this webinar is

4   maintained on the Lawson.com website?

5   A.   Based on the URL, I would say yes. But

6   I don't know if that's -- I don't know that to be a

7   fact, though.

8   Q.   Can you turn to the page marked ePlus

9   0621211?

10   A.   Yeah.

11   Q.   And do you see on that page the search

12   user interface?

13   A.   Yes.

14   Q.   And do you see that in this particular

15   presentation somebody input the term "clip"?

16   A.   I can't really make it out, but...

17   Q.   But you see that there is an input --

18   A.   Yeah.

19   Q.   -- in the search input box?

20   A.   It appears to be a clip, yes.

21   Q.   Is that how a user would go about

22   inputting a keyword to conduct a search of the item

34

1   master database for items to be requisitioned?

2   A.   Yes.

3   Q.   Can you explain at a high level how the

4   keyword search function works in Requisition

5   Self-Service?

6   A.   Based on the value entered, we will,

7   using a 4GL program, search the Lawson -- a

8   Lawson -- search Lawson tables for matches.

9   Q.   What Lawson tables are searched for

10   matches?

11   A.   I don't know if I will get all of them,

12   but they are keyword tables.

13   Q.   How are those keyword tables built?

14   A.   I'm sorry, what was that?

15   Q.   How does the system build those keyword

16   tables?

17   A.   Through application logic.

18   Q.   Are those keyword tables used as indices

19   to point to item data records in the item master

20   database?

21   A.   Yes.

22   Q.   And how does the software determine what

35

1   keywords are indexed in those tables?

2   A.   It's based on -- Could you rephrase

3   that?

4   Q.   How does the system go about determining

5   the keywords that are indexed in those tables?

6   A.   There is a setup screen that allows you

7   to choose which -- which fields to use.

8   Q.   Are there particular item data fields

9   that are indexed by default?

10   A.   No.

11   Q.   So what are the possible item attributes

12   that can be indexed for searching?

13   A.   I don't know all those off the top of my

14   head.

15   Q.   What are the ones that you remember?

16   A.   Item number, item description. I would

17   have to do some research to provide a full list.

18   Q.   Then once you build these keyword index

19   tables, how does the -- how would the search engine

20   go about executing a search using those indices?

21   A.   I'm not sure I understand the question.

22   Q.   So -- Okay. Assume that somebody was

36

1   going to conduct a search for clips and the search

2   index had been built and it had indexed at least

3   item number and item description, how would the

4   search engine go about executing the input search

5   for clip using those index tables?

6   A.   It would read the keyword tables looking

7   for matches with the search criteria provided.

8   Q.   And if it found a match in those tables,

9   what would be the next step?

10   A.   It would then retrieve the item master

11   information to be displayed.

12   Q.   So --

13   A.   And search results.

14   Q.   Sorry.

15   So in these index tables, if you had an

16   entry for clip, what would you expect to find with

17   that clip? Would it have locations in the item

18   master database where there would be items that had

19   attributes matching clip?

20   A.   Would you repeat that? I'm sorry.

21   Q.   If you had an entry in these index

22   tables corresponding to clip, what would you expect

37

1   to find in that database table with clip? Would

2   there be identifications of locations of item data

3   records in the item master database that had some

4   attribute that corresponded to clip?

5   A.   I am confused by your question, with

6   some of the terms that you are including.

7   Q.   Okay. How would you -- Let me step

8   back.

9   How would you describe what information

10   is included in the index tables that you refer to?

11   A.   Which tables?

12   Q.   The keyword search index tables.

13   A.   I would describe the existence of the

14   keyword and a reference to the -- back to the item

15   master record that contains that keyword.

16   Q.   So once the search engine searched the

17   search index for a match to the keyword that was

18   input, it would then retrieve from that index

19   various locations of records in the item master

20   that corresponded to that keyword; is that correct?

21   A.   Well, the word "locations" is throwing

22   me. It retrieves item master information.

39

1   correct?

2   A.   No.

3   Q.   What would happen next after the search

4   engine retrieved the records from the item master

5   that matched the keyword?

6   A.   Well, the search engine produces an

7   output file, and once that's produced, its job is

8   done at that point.

9   Q.   How is the output file -- Well, let me

10   step back.

11   What's the nature of the output file

12   produced by the search engine?

13   A.   It's an XML file.

14   Q.   And what type of data is contained in

15   that XML file?

16   A.   It's item master information.

17   Q.   What type of item master information is

18   contained in the XML file?

19   A.   Basically, the results from the search.

20   Q.   What would be the nature of those

21   results from the search?

22   A.   Can you rephrase that?

38

1   Q.   When you said that the keyword search

2   index tables had a keyword and then a reference

3   back to the item master that contained that

4   keyword, what is the nature of that reference back

5   to the item master that contains that keyword?

6   A.   I don't understand your question.

7   Q.   You indicated in your prior testimony

8   that the keyword search index would have an entry

9   for a keyword and then a reference back to the item

10   master where that keyword was located. What's the

11   nature of that reference back to the item master?

12   A.   It would be the key fields in the index

13   of the item master.

14   Q.   And then the search engine would do the

15   lookup against the search index, find those

16   references back to the item master, and go and

17   retrieve those specific records from the item

18   master; is that correct?

19   A.   Yes.

20   Q.   And then the search engine will display

21   a hit list of records from the item master that

22   matched that keyword that was input; is that

40

1   Q.   What type of data comprised the results

2   from the search?

3   A.   It would include the information being

4   displayed. I don't know all of the data.

5   Q.   So it would include description of each

6   item that matched the input keyword?

7   A.   Not necessarily.

8   Q.   Would it include item numbers for each

9   item that matched the keyword?

10   A.   Not necessarily.

11   Q.   What are the types of data that can be

12   included in the results from the search?

13   A.   Can you repeat the question?

14   Q.   What are the types of data that can be

15   included in the results of the search?

16   A.   I'm not sure what you mean by types of

17   data.

18   Q.   What information is included in the

19   results of the search?

20   A.   The item description, UM, some

21   information that's displayed.

22   Q.   The types of information that's

41

1   displayed on ePlus 0621211?

2   A.   Correct.

3   Q.   How does -- You said that the search

4   engine produces an output file. How is that output

5   file then displayed back to a user of the system?

6   A.   It is consumed by the RSS application.

7   Q.   What do you mean by that?

8   A.   It is read, processed.

9   Q.   And then rendered on the screen?

10   A.   Correct.

11   Q.   Can multiple keywords be input for a

12 search query?

13   A.   Yes.

14   Q.   And how would the search engine go about

15 executing a search where there are multiple

16 keywords input?

17   A.   I believe it has to match both of the

18 keywords.

19   Q.   So in searching against the search

20 index, can you describe in a step-by-step fashion

21 how it would process?

22   Say I had a search query for "black

43

1   functionality handle special characters such as

2   hyphens or commas?

3   A.   I don't know for sure. Some of them are

4   not allowed, or they are stripped out of the text.

5   Q.   Do you know which special characters are

6   not allowed?

7   A.   Not offhand, no.

8   Q.   Sir, can you turn to the next page of

9   Exhibit 2 --

10   A.   Uh-huh.

11   Q.   -- which is ePlus 0621212. And do you

12 see on the top left there is a tab labeled

13 "Advanced Search"?

14   A.   Yes.

15   Q.   Can you describe at a high level how the

16 advanced search function works?

17   A.   Identical to the simple search or the

18 normal search.

19   Q.   What's the difference between advanced

20 search and the normal search?

21   A.   I believe you can designate which

22 keywords you would like to search against.

42

1   clip." How would the search engine go about

2   executing that?

3   A.   I don't know.

4   Q.   Would it look up the keyword "black" in

5   the search index and then look up the keyword

6   "clip"?

7   A.   Yes.

8   Q.   So it would find -- and then you said

9   that it would have to -- the results would have to

10 include both keywords that were input?

11   A.   I believe that is correct.

12   Q.   So --

13   A.   I would have to --

14   Q.   So it performs a logical and type

15 process?

16   A.   I would assume so, yes.

17   Q.   So in conducting a search against the

18 search index, can you describe how it would perform

19 that logical and process?

20   A.   I don't know without looking at the

21 source code.

22   Q.   How does the keyword search

44

1   Q.   But can't you do that in the normal

2   search as well?

3   A.   No.

4   Q.   When you were explaining the keyword

5   search, we talked about inputting a keyword and

6   then conducting a search using the normal search

7   functionality.

8   How does the process differ using the

9   advanced search functionality?

10   A.   Which piece of the software are we

11 talking about?

12   Q.   Well, why do you have something labeled

13 advanced search if the functionality is the same as

14 the regular keyword search?

15   A.   The advance search allows you to choose

16 which keywords you would want to search against.

17   Q.   I don't really under -- Can you explain

18 to me the distinction, then, between the normal

19 keyword search functionality and the advanced

20 search functionality?

21   A.   The advanced -- or the simple search or

22 the normal search uses all the keywords that have

45

1   been indexed in looking for a match. The advanced
2   search has options on that search screen that allow
3   you to designate which of those designated keywords
4   you would like to search against, if desired.
5   Q.   So if I had input "clip" into the
6   advanced search user interface, can you describe
7   the process that the search engine would go through
8   with respect to searching against the index and
9   retrieving the data?
10   A.   It's identical to the normal search.
11   Q.   Is the advanced search functionality
12   enabled by default in the product as delivered?
13   A.   No.
14   Q.   What do you need to do in order to
15   enable the advanced search functionality?
16   A.   Change an entry in the configuration
17   file.
18   Q.   What entry needs to be changed in the
19   configuration file?
20   A.   The allow advanced search option.
21   Q.   Using advanced search, can you exclude
22   certain keywords from being searched?

46

1   A.   Yes.
2   Q.   Is that a distinction between the normal
3   keyword search functionality and the advanced
4   search functionality?
5   A.   Yes.
6   Q.   We talked about before with respect to
7   the normal keyword search going in and enabling the
8   different data fields for keyword search
9   functionality. Is that same process done if you
10   want to use the advanced search feature?
11   A.   Yes.
12   Q.   Are you familiar with user-defined
13   fields that can be enabled for searching?
14   A.   Yes.
15   Q.   How are those user-defined fields set
16   up?
17   A.   I'm not sure --
18   Q.   How would a user go about setting up a
19   user-defined search field?
20   A.   It would enable it -- a keyword just
21   like they would any of the other available fields.
22   Q.   So do you have to do anything different

47

1   with respect to the item data records in order to
2   enable a user-defined field?
3   A.   No.
4   Q.   How do you actually go about defining a
5   field? Say I wanted to define vendor name. How
6   would I go about making that into a user-defined
7   field for searching?
8   A.   I am not sure I understand the question.
9   Q.   Say I wanted to create a user-defined
10   field called vendor name. How would I go about
11   doing that?
12   A.   The user-defined fields are present on
13   the item master. I mean, they're preformed fields
14   for you to populate.
15   Q.   And how would I go about doing that?
16   A.   You would manually key in a value.
17   Q.   And then how do I make that field
18   searchable?
19   A.   That's part of the -- back to the
20   keyword setup. You would set up the user-defined
21   field as searchable.
22   Q.   Are you familiar with a program called

48

1   PO13 vendor item?
2   A.   Yes.
3   Q.   How does that PO13 vendor item program
4   provide a list of all items available from a
5   particular vendor?
6   A.   It doesn't, that I know of.
7   Q.   What is that PO13 program used for?
8   A.   Associating the item master to a
9   particular vendor item.
10   Q.   And how would you go about doing that?
11   A.   Manually key in the information
12   associated with that vendor item.
13   Q.   Can the vendor item number field be made
14   searchable in Requisition Self-Service?
15   A.   Yes.
16   Q.   So users can search by vendor item to
17   locate an item from a particular vendor that they
18   want to requisition; is that correct?
19   A.   No.
20   Q.   So if vendor item -- You said vendor
21   item number can be made searchable in Requisitions
22   Self-Service.

49

1   A.   Yes.
2   Q.   So why, then, can't users search by
3   vendor item number to locate an item from a
4   particular vendor that they want to requisition?
5   A.   Well, they can search for the vendor
6   item number to return the item master record that's
7   associated with the --
8   (The reporter asked for clarification.)
9   A.   They can search by vendor item to return
10   the associated item master record. Yeah.
11   Q.   Are you familiar with a program called
12   Keyword Search Load IC800?
13   A.   Uh-huh. Yes.
14   Q.   What is the purpose of Keyword Search
15   Load?
16   A.   It is to build the keyword table,
17   populate the information.
18   Q.   How does it -- How is the keyword table
19   built? Can you explain at a high level?
20   A.   Based on the keywords that you have
21   selected to be searchable, it will spin through the
22   appropriate existing data and build the keyword

50

1   list.
2   Q.   Can data fields be selected or added to
3   the item master?
4   A.   I don't understand that question.
5   Q.   Are there -- Well, let me step back.
6   Are there particular data fields
7   associated with item records in the item master
8   that are there by default?
9   A.   Nothing -- No. All data is provided via
10   the client.
11   Q.   Are there particular data fields that
12   are recommended by Lawson to be included with item
13   records in the item master?
14   A.   Not that I'm aware of.
15   Q.   How does the user go about defining
16   fields with respect to the item data that populates
17   the item master?
18   A.   You can manually key it in or I believe
19   they can import it from a legacy system, if they
20   have an old system.
21   Q.   Does Lawson provide formats for data
22   input -- Strike that.

51

1   Does Lawson provide formats for the
2   import of item data into the item master?
3   A.   I believe we do, yes.
4   Q.   Do you know what fields are -- what
5   fields are specified in those formats with respect
6   to the item data?
7   A.   I don't know all of them, no.
8   Q.   So a Lawson system user, you said, can
9   select data fields to include in the item master
10   with respect to the item records; is that correct?
11   A.   No.
12   Q.   Why isn't that correct?
13   A.   You can't select which fields are on the
14   item master table.
15   Q.   So what fields are included on the item
16   master table?
17   A.   There are a number of fields. I would
18   have to look at the...
19   Q.   What would you need to look at in order
20   to answer that question?
21   A.   The file layout.
22   Q.   Is there a specific file layout that you

52

1   would need to look at?
2   A.   The item master.
3   Q.   Is there any relationship between the
4   item master and the vendor items PO13?
5   A.   Yeah.
6   Q.   What's the relationship between those
7   two?
8   A.   There's one item master record to X
9   number of vendor item records.
10   Q.   Can the item master contain information
11   concerning items that is inconsistent with
12   information in the vendor items table?
13   A.   I'm not sure what you mean by that.
14   Q.   So how would you relate an item master
15   record to a vendor item number record?
16   A.   You wouldn't relate it that way. The
17   relation is from the vendor item record, basically
18   linking it to the item master. I mean, the item
19   master needs to be set up prior to creating a
20   vendor item record.
21   Q.   Then how do you link the two tables?
22   A.   You don't. There's no linking. The

53

1 item master number is present on the item master
2 table and on the vendor item table.
3   Q.   When a specific item record is retrieved
4 from the item master using the search engine in
5 Requisition Self-Service, how does the software
6 correlate that item record to one or more suppliers
7 of that item?
8   A.   I'm not sure I follow the question
9 again. I'm sorry.
10   Q.   Is the vendor -- Is data in the vendor
11 item table also included in the search index?
12   A.   We can search by vendor item. Yes.
13   Q.   So that data is indexed in that search
14 index with the Keyword Search Load?
15   A.   I believe so, yes.
16   Q.   Do the item records in the item master
17 contain vendor codes or other information regarding
18 the suppliers for items within it?
19   A.   No.
20   Q.   How can the vendor information
21 associated with a particular item record be viewed?
22   A.   Via PO13.

54

1   Q.   Can the vendor information be added as a
2 field to the item master?
3   A.   No.
4   Q.   Can the item master database be
5 implemented using multiple database instances?
6   A.   Would you repeat the question?
7   Q.   Can the item master database be
8 implemented using multiple database instances?
9   A.   No. They would have to be cloned to
10 each other.
11   Q.   Well, if someone had, you know, a large
12 volume of data, could they implement their item
13 master using multiple database instances?
14   A.   They would have to be cloned, so they
15 couldn't put half the information in one database
16 and half in the other.
17   Q.   Why not?
18   A.   It wouldn't work.
19   Q.   Are you familiar with a program called
20 Corporate Item Group (IC00.1)?
21   A.   Yes.
22   Q.   What is the purpose of the Corporate

55

1 Item Group program?
2   A.   It's to set up an overall hierarchy of a
3 parent over all the items.
4   Q.   What do you mean by "an overall
5 hierarchy of a parent over all the items"?
6   A.   You may have -- You can have multiple
7 item groups that each contain a separate group of
8 items.
9   Q.   How would you make use of these multiple
10 item groups?
11   A.   I don't know in a business process how
12 they would do it. But each company can only have
13 one item group, so you can't cross them.
14   Q.   Why would you want to set up multiple
15 item groups that have separate groups of items?
16   A.   It's up to the client to decide that.
17   Q.   Do you know any reasons why particular
18 users set up multiple item groups?
19   A.   I don't know specific reasons, no.
20   Q.   Are you familiar with an application
21 called the Lawson Design Studio?
22   A.   I've heard of it, yes.

56

1   Q.   What's the purpose of the Lawson Design
2 Studio?
3   A.   I believe it allows you to customize the
4 input forms to either hide fields or add additional
5 logic.
6   Q.   Is it ever used in conjunction with
7 Lawson's Procurement applications?
8   A.   It can be, yes.
9   Q.   How would it be used in conjunction with
10 Lawson's Procurement applications?
11   A.   The same as the overall purpose, to
12 customize a particular form.
13   Q.   What particular forms can be customized
14 with respect to the Lawson Procurement
15 applications?
16   A.   All of the 4GL forms, I believe.
17   Q.   Do you know the names of any specific
18 forms that can be customized with respect to the
19 Procurement applications?
20   A.   Yes.
21   Q.   What are some of the ones that you're
22 familiar with?

57

1   A.   IC00.

2   Q.   Any others?

3   A.   I could name as many as I could name,

4   but there are hundreds and hundreds of forms.

5   Q.   Does Lawson provide any assistance to

6   its customers in connection with using the Design

7   Studio application?

8   A.   I'm not aware of that.

9   Q.   Do you know if Lawson provides any

10   training to its customers in connection with using

11   the Design Studio?

12   A.   I believe we do, yes.

13   Q.   Is the Design Studio application

14   included with every software licensed from Lawson?

15   A.   I don't know.

16   Q.   Who would know the answer to that?

17   A.   I -- I'm not sure.

18   Q.   Is the --

19   A.   Sorry.

20   Q.   Is the Design Studio application

21   required in order to set up the S3 Procurement

22   suite?

59

1   A.   No.

2   Q.   What tasks can utilize the drill-around

3   functionality in connection with the S3 Procurement

4   applications?

5   A.   It's not a task. It's an individual

6   field that it's enabled on.

7   Q.   What fields can be enabled for using the

8   drill-around functionality?

9   A.   I believe any input field.

10   Q.   How would you go about -- Strike that.

11   In what software application is the

12   drill-around functionality included?

13   A.   All -- All of the 4GL applications.

14   Q.   Can the drill-around functionality be

15   used to perform drill-down searches for items from

16   the item master?

17   A.   From the item master you wouldn't. That

18   is the purpose of the item master screen, is to

19   view item master information. There would be no

20   need to drill down.

21   Q.   From what screen is the drill-around

22   functionality accessed?

58

1   A.   No.

2   Q.   Are you familiar with the functionality

3   called the Lawson Drill Around?

4   A.   Uh-huh. Yes.

5   Q.   What's the functionality associated with

6   the Lawson Drill Around?

7   A.   It allows you to view information about

8   a particular field that it's enabled on.

9   Q.   Can Lawson's Drill Around functionality

10   be used in connection with the S3 Procurement

11   applications?

12   A.   Yes.

13   Q.   How would it be used in connection with

14   the S3 Procurement applications?

15   A.   Again, the same as the overall purpose,

16   just to view additional information of a particular

17   field --

18   Q.   So --

19   A.   -- or form.

20   Q.   So if a user wanted to conduct a search

21   of the item master, could they make use of a Lawson

22   Drill Around functionality?

60

1   A.   Again, I would say the majority of all

2   Lawson online forms.

3   Q.   So if I had -- if I had the Requisition

4   Self-Service application open on my desktop and I

5   had the search user interface open, such as shown

6   in Exhibit 2 at ePlus 0621211, how would I access

7   the drill-around functionality from that screen?

8   A.   There is not a drill-around

9   functionality there.

10   Q.   How would I access the drill-around

11   functionality from the Requisition Self-Service

12   application?

13   A.   It would have to be enabled -- In this

14   case it would be programmed on the particular

15   fields.

16   Q.   How can the drill-around functionality

17   be enabled?

18   A.   Through programming logic.

19   Q.   What would I -- Can you walk me through

20   step by step how I would go about enabling the

21   drill-around functionality?

22   A.   You would have to -- Depending on what

61

1 language the product was coded in, you would have

2 to make the necessary calls to the drill-around

3 object and provide the appropriate fields to

4 execute that drill-around option.

5   Q.   So if I had the Requisition Self-Service

6 application, how would I make the necessary calls

7 to the drill-around object and provide the

8 appropriate fields to execute that drill-around

9 option?

10   A.   Again, it would depend on what you want

11 to drill around on, what you're after, and it would

12 be some custom coding by whoever was intended to do

13 it.

14   Q.   What types of data can be drilled around

15 using the drill-around functionality?

16   A.   It depends on what has been defined in

17 the 4GL application.

18   Q.   What are all the types that are possible

19 to be defined?

20   A.   I'm not sure I follow the question.

21   Q.   I'm just trying to figure out a common

22 sense use of Drill Around because I haven't seen it

62

1 in operation. So I just saw the words, so I want

2 to understand how it works.

3   So if I have Lawson's S3 Procurement

4 applications, say I have Requisitions, Requisitions

5 Self-Service, Purchase Order and Inventory Control,

6 how could I make use of this drill-around

7 functionality?

8   A.   They come enabled with the product out

9 of the box.

10   Q.   And what types of data can I drill

11 around using the drill-around functionality?

12   A.   Whatever has been defined by those

13 applications.

14   Q.   Are there any things that are predefined

15 by default in those applications that can be -- for

16 which you can use the drill-around functionality?

17   A.   Yes. Each -- Each product delivers a

18 file with the drill-around information set up.

19   Q.   And what data is predefined by default

20 for drill-around functionality in connection with

21 the Requisition Self-Service application?

22   A.   Nothing specific direct to Self-Service.

63

1   Q.   What data is predefined by default for

2 drill-around functionality in connection with the

3 Requisition application?

4   A.   It's a 4GL set of logic that provides --

5 it's a file written in Lawson 4GL code, proprietary

6 code.

7   Q.   Can you give me an example of how a user

8 would use the drill-around functionality in

9 connection with a Lawson Procurement system?

10   A.   They would click on a drill icon on the

11 form.

12   Q.   On what type of form?

13   A.   Online form.

14   Q.   Can you give me an example of a form

15 where drill-around functionality would be used?

16   A.   IC11.

17   Q.   What does IC11 stand for?

18   A.   The item master program.

19   Q.   And how would I use the drill-around

20 functionality in connection with the item master

21 program?

22   A.   Would you repeat that?

64

1   Q.   How would I use the drill-around

2 functionality in connection with the item master

3 IC11 program?

4   A.   To view additional information about a

5 particular field you're drilling on.

6   Q.   So say I wanted to view information

7 about the item description. How would I use that

8 Drill Around?

9   A.   I don't believe there is a Drill Around

10 for item description.

11   Q.   What fields in the item master can Drill

12 Around be used with?

13   A.   I don't know offhand.

14   Q.   What would you need to look at to

15 determine that?

16   A.   The online application.

17   Q.   Which online application?

18   A.   IC11.

19   Q.   Is item description one of the fields of

20 an item record that can be made searchable, keyword

21 searchable?

22   A.   Yes.

65

1   Q.   Is catalog number one of the fields

2   associated with an item record that can be made

3   keyword searchable?

4   A.   No.

5   Q.   Is manufacturer number one of the fields

6   associated with an item data record that can be

7   made keyword searchable?

8   A.   I would have to look at the list of

9   fields.

10   Q.   Is UNSPSC code one of the fields that

11   can be made searchable, keyword searchable?

12   A.   I don't know.

13   Q.   Are there any other fields that you

14   recall that can be made keyword searchable?

15   A.   The item number.

16   Q.   Any other fields?

17   A.   Not off the top of my head.

18   Q.   Are you familiar with something called

19   the RSS config.xml file?

20   A.   Yes.

21   Q.   What's the purpose of the RSS config.xml

22   file?

67

1   Q.   What is the purpose of that program?

2   A.   It's a -- It's basically similar to

3   IC11. It allows you to enter item master

4   information. And it also allows you to -- It's

5   basically a combination of IC11 and IC12 combined

6   into a single program that allows you to do the

7   same functionality as those two programs.

8   Q.   So is there a particular situation when

9   you would use IC10.1 versus IC11?

10   A.   It's user preference, which form they

11   would rather interface with.

12   Q.   Are you familiar with a program referred

13   to as Item Attributes (IC56.1)?

14   A.   IC56? I am not.

15   MS. ALBERT: Let me have the reporter

16   mark as Dooner Exhibit 3 a document bearing

17   production numbers LE00120322 through 364.

18   (Exhibit 3 marked for identification and

19   attached hereto.)

20   BY MS. ALBERT:

21   Q.   Are you familiar with the document

22   that's been marked as Dooner Exhibit 3?

66

1   A.   It provides some customability to the

2   RSS application.

3   Q.   What can be customized using the RSS

4   config.xml file?

5   A.   Whether to show the advanced search tab

6   or not.

7   Q.   Is there anything else that can be

8   customized using the RSS config.xml file?

9   A.   Yes.

10   Q.   What else?

11   A.   I don't remember everything offhand.

12   Q.   Do you recall anything else?

13   A.   Some user-defined help text.

14   Q.   Do you recall anything else?

15   A.   Not off the top of my head I don't.

16   Q.   Is this RSS config.xml file created or

17   used in every implementation of Requisition

18   Self-Service?

19   A.   Yes.

20   Q.   Are you familiar with a program referred

21   to as Item Formats IC10.1?

22   A.   Uh-huh.

68

1   A.   (Witness peruses document.)

2   I don't recall seeing it.

3   Q.   The title on the document is "RSS XML

4   8.1.0.51 and RSS XML 9.0.0.2 Academy."

5   Do you know to what that refers?

6   A.   Yeah.

7   Q.   What does that refer to?

8   A.   It was a class or a session at our user

9   exchange.

10   Q.   Do you see on the top left-hand corner

11   there is the letters C-U-E and then underscore 06?

12   A.   Yeah.

13   Q.   To what does that refer?

14   A.   Well, that was our user exchange in I'm

15   assuming 2006.

16   Q.   So C-U-E, do you know what that acronym

17   stands for?

18   A.   I believe it was conference and user

19   exchange. Customer user exchange. I'm not sure.

20   Q.   Who attends these CUE meetings?

21   A.   Clients.

22   Q.   Does Lawson conduct a CUE meeting every

69

1   year?

2   A.   Yes.

3   Q.   Does Lawson conduct CUE meetings more

4   than once a year?

5   A.   Not that I'm aware of.

6   Q.   When was the last CUE meeting conducted?

7   A.   2009.

8   Q.   Do you know, is it held at the same time

9   each year?

10   A.   Yeah, March-April time frame.

11   Q.   So is a CUE meeting upcoming for 2010?

12   A.   Yes.

13   Q.   When is that scheduled for?

14   A.   I believe it's the end of April.

15   Q.   What is the purpose of these CUE

16   meetings?

17   A.   To educate clients and allow them to ask

18   questions, learn.

19   Q.   Where are the CUE meetings held?

20   A.   Various locations.

21   Q.   Do you personally participate in CUE

22   meetings?

70

1   A.   I have, yes.

2   Q.   Did you have any responsibilities in

3   connection with the CUE meeting held in 2006?

4   A.   You know, I don't remember. I would

5   have to find out where it was held.

6   Q.   Are there any particular individuals

7   within Lawson who have responsibilities for

8   conducting training sessions relating to

9   Requisition Self-Service at the CUE meetings?

10   A.   Yes.

11   Q.   Who are those individuals?

12   A.   It can vary year to year.

13   Q.   Do you know who had responsibilities for

14   conducting training sessions relating to

15   Requisition Self-Service in 2006?

16   A.   I don't.

17   Q.   If you look on the first page in the

18   last two sentences at the top, the bullet reads:

19   "This is a hands-on session and you'll have a

20   firsthand experience with the new look and feel of

21   the application. This document contains

22   information about these enhancements and the setups

71

1   for creating a requisition from all of the

2   different options we offer in this application."

3   Do you see those sentences?

4   A.   Yep.

5   Q.   Do the CUE meetings typically include

6   instructional hands-on training sessions of the

7   types mentioned here?

8   A.   No.

9   Q.   What -- In what circumstances are

10   hands-on training sessions provided at CUE

11   meetings?

12   A.   I believe the academies are hands-on.

13   Q.   So are there typically academies

14   conducted at each CUE meeting?

15   A.   There are -- Yes, there are some.

16   Q.   Can you turn to the page with the Bates

17   number LE00120324.

18   A.   Uh-huh.

19   Q.   The title on that page is "RSS, What's

20   Different/New."

21   Do you see that?

22   A.   Yeah.

72

1   Q.   The fourth paragraph down reads: "We've

2   added the ability to search for an item within a

3   template."

4   Do you see that?

5   A.   Yes.

6   Q.   Can you describe at a high level how the

7   search for an item using templates works?

8   A.   A user will bring up a template, which

9   is a list of predefined items, and they can now

10   search within that set of predefined items for a

11   value.

12   Q.   How is the template created?

13   A.   PO25, manually keyed. It's manually

14   keyed in.

15   Q.   And then --

16   A.   I believe it's PO25.

17   Q.   And you said once the user brings up one

18   of these templates, they can do a search within

19   that set of items on the template. How does that

20   process work?

21   A.   Through IOS capabilities. We query that

22   particular set of data associated with that

73

1 template.

2   Q.   What is IOS?

3   A.   It's our technology layer.

4   Q.   What does the acronym IOS stand for?

5   A.   I don't know.

6   Q.   So does the search engine execute a

7 search to look for item records in the item master

8 that match the items that are on this template?

9   A.   No.

10   Q.   So how does the search work to find the

11 items on the template?

12   A.   It searches the template list of items.

13   Q.   What -- What data does it execute a

14 query against?

15   A.   It's a separate table than the item

16 master. It's proc temp line.

17   Q.   What data is maintained within the proc

18 temp line table?

19   A.   I don't know offhand.

20   Q.   Do you know some of the data?

21   A.   The item number.

22   Q.   Anything else?

74

1   A.   No, not at this point. I would have to

2 look.

3   Q.   Going back to Exhibit 3 and the page we

4 were referring to, the "RSS, What's Different/New"

5 page, underneath the paragraph we were just

6 referring to, the next sentence reads: "We've

7 enhanced the search capabilities on vendor, account

8 unit and account fields."

9   So a user can search by vendor in the

10 Lawson item master; is that correct?

11   A.   No.

12   Q.   So what are the search -- How do the

13 search capabilities on vendor work?

14   A.   I do not know. I don't know what that's

15 referring to. Other than...

16   Q.   Do you have an educated --

17   A.   Well, when you add a special item, you

18 can choose -- if you know the vendors you're going

19 to purchase it from, you can choose a vendor at

20 that point.

21   Q.   So how would it execute a search based

22 on that?

75

1   A.   It would be the -- You would select on

2 the vendor field and view a list of all vendors.

3 Valid vendors for your company. Nothing associated

4 with the item. It's just a complete list of all

5 vendors.

6   Q.   Can you turn to the page with the Bates

7 number ending 327.

8   A.   Uh-huh.

9   Q.   Do you see about -- well, around the

10 middle of the page there is something -- there is a

11 sentence reading: "Skip - specials will be added

12 without checking the item against the item

13 catalog."

14   A.   Yes.

15   Q.   What is a special item?

16   A.   Something that does not exist within the

17 Lawson system.

18   Q.   And then underneath that sentence that I

19 just read there is a sentence reading: "Users are

20 warned before allowed to add items in the item

21 catalog as special." And then there is a dialogue

22 box underneath that saying: "C1000 is available in

76

1 the catalog. Would you like to add C1000 from the

2 item catalog instead?"

3   A.   Uh-huh.

4   Q.   When would this warning scenario occur?

5   A.   When attempting to add an item to the --

6 your shopping cart or the requisition.

7   Q.   When would you have this warning come

8 up?

9   A.   When trying to add an item to the --

10   Q.   It doesn't happen for every item that

11 you try to add to the shopping cart; is that

12 correct?

13   A.   Correct.

14   Q.   So in what circumstances --

15   A.   Adding a special item.

16   Q.   If you add a special item that is found

17 in the catalog rather than one that's not existent

18 in the catalog, you would get this warning?

19   A.   Depending on how you've set up the

20 option for special item validation, yes.

21   Q.   So the system gives the user a warning

22 that the item they're trying to add as a special

77

1   item is in fact in the item catalog, correct?

2   A.   Yes.

3   Q.   Can you turn to the page with the Bates

4   number ending 330. And do you see a heading in

5   bold on that page, "Cobalt Programs for RSS XML"?

6   A.   Yeah.

7   Q.   And below that there are a number of

8   programs listed, including RQIC, RQID, RQIF. Do

9   you see those?

10   A.   Yes.

11   Q.   Are all of the programs listed on that

12   page included with the Requisition Self-Service

13   application as delivered?

14   A.   No.

15   Q.   Which ones are not?

16   A.   None of them are delivered with

17   Requisition Self-Service.

18   Q.   Are they delivered with the Requisitions

19   application?

20   A.   Yes.

21   Q.   Do you see the program identified as

22   RQIG and it indicates it gathers shopping lists?

78

1   A.   Yes.

2   Q.   How do shopping lists differ from

3   shopping chart items?

4   A.   A shopping list is synonomous or a

5   template, a predefined list of items.

6   Q.   And how is that predefined list of items

7   built?

8   A.   I believe I stated earlier, PO25 -- I

9   may have misspoken. It's either PO15 or PO25. The

10   user builds the templates or the shopping list.

11   Q.   Right underneath that program there is

12   one labeled as RQIH, which retrieves information on

13   items entered through express.

14   Do you see that?

15   A.   Yes.

16   Q.   How does this express functionality

17   work?

18   A.   If you know the exact Lawson item

19   number, you can key it in on a screen in RSS and it

20   will retrieve the necessary information to add it

21   to your requisition.

22   Q.   How does it retrieve the information to

79

1   add it to your requisition?

2   A.   I'm not sure I follow the question.

3   Q.   Is there a search executed to find item

4   records that match the item number that you

5   entered?

6   A.   You're entering a specific item, so it

7   validates that that is a Lawson item. It has to

8   match exactly. It's the item number, not a

9   description, nothing else.

10   Q.   So how does it go about validating that

11   the number that you entered is a Lawson item?

12   A.   It compares it to the item master to see

13   if it exists.

14   Q.   So it doesn't execute a search against

15   the search index tables that we talked about

16   earlier?

17   A.   No.

18   Q.   Can you turn to the page with the Bates

19   number ending 332. What's the name of the form

20   that's shown on that page?

21   A.   Requesters.

22   Q.   And what's the purpose of the requester

80

1   form?

2   A.   To define requesters.

3   Q.   What does it define about requesters?

4   A.   You can define default information for

5   that particular requester.

6   Q.   Do you see underneath the display of the

7   form the text reads: "Will your requesters only

8   need to see contract items? Will your requesters

9   only need to see internal items? Will they be

10   allowed to punch out to vendor websites to create

11   requisitions?"

12   Do you see that text?

13   A.   Yeah. Yes.

14   Q.   Can the system be set up so that some

15   requesters can only access items associated with

16   particular vendor contracts and not other vendor

17   contracts?

18   A.   No.

19   Q.   Can the system be set up so that

20   different requesters have different access rights?

21   A.   Can you be a little more specific?

22   Q.   This text that we referred to under the

81

1   form, does that mean that particular requesters can

2   be given differing access rights from other

3   requesters as far as what data they're entitled to

4   use for requisitioning?

5   A.   Yes.

6   Q.   Can you turn to the next page of

7   Exhibit 3 ending with the Bates number 333.

8   A.   Uh-huh.

9   Q.   What form is shown on this page?

10   A.   That's Requisition Self-Service.

11   Q.   And on the right-hand side there is a

12   depiction of the shopping cart part of the user

13   interface; is that correct?

14   A.   Yes.

15   Q.   The last sentence on that page reads:

16   "Checkout saves items to database, empties cart and

17   releases requisition."

18   To what database does checkout save

19   items to?

20   A.   The same database that RQ10 does.

21   Q.   Is there a particular name for that

22   database?

83

1   A.   Which one?

2   Q.   IC00.5.

3   A.   It allows you to decide which keyword

4   fields you will enable to be searched.

5   Q.   What's the name of that program?

6   A.   It's the item group keyword setup.

7   Q.   So depending on the fields that you've

8   enabled for keyword searching, then the search

9   engine will search -- That builds the search index

10   that's used for keyword searching; is that correct?

11   A.   Could you repeat that?

12   Q.   IC00.5, does that build the search index

13   that's used for keyword searching?

14   A.   No.

15   Q.   Which program is the one that builds the

16   search index based on the keyword origin fields

17   that you've enabled for keyword searching?

18   A.   I believe it's IC811. I'm sorry, IC800.

19   IC800.

20   Q.   And this IC00.5 program that's

21   referenced on this page, that program comes with

22   the product as delivered; is that correct?

82

1   A.   No.

2   Q.   Can you turn to the page with the Bates

3   number ending 339. And the title of this page is

4   "Creating a Requisition by Search Catalog."

5   The text down below -- That second

6   paragraph in the text down below the display, the

7   first sentence reads: "When you set up synonyms in

8   IC32.1 you're creating a relationship between

9   alternate spellings or terms for keywords you've

10   enabled in IC00.5 which come from the data setup on

11   IC11.1 and IC12.1."

12   Are those the two programs that we

13   talked about earlier for setting up the item master

14   data?

15   A.   IC11 is for the item master.

16   Q.   What is IC12 for?

17   A.   Item location.

18   Q.   And the IC00.5 program, is that the

19   Keyword Search Load program that we referred to

20   earlier?

21   A.   No.

22   Q.   What's that program do?

84

1   A.   It comes with the RQ system, yes. I'm

2   sorry, the IC system.

3   Q.   The Inventory Control application?

4   A.   Yes.

5   Q.   And then the IC11.1 program comes with

6   the Inventory Control application as delivered; is

7   that correct?

8   A.   Yes.

9   Q.   And the IC12.1 program comes with the

10   Inventory Control application as delivered; is that

11   correct?

12   A.   I believe so, yes.

13   Q.   Can you turn to the next page ending

14   with the Bates number 340. And under Item 4 on

15   that page it says: "You may go to the advanced

16   search tab for additional searching options.

17   Advanced search allows you to search on specific

18   fields. You can search for a word (SM) and to

19   ignore one keyword. If you don't use the ignore

20   field, you may get a larger list."

21   Do you see that text?

22   A.   Yes.

85

1   Q.   What fields does the advanced search

2   functionality enable you to search on?

3   A.   Those that are defined in the IC05.

4   Q.   And the advanced search as compared to

5   the normal keyword search allows you to specify to

6   ignore a keyword; is that correct?

7   A.   Yes.

8   Q.   And if you don't specify a keyword to

9   ignore, what's the data that would be retrieved by

10 the advanced search?

11 A.   It would be the same as the normal

12 search.

13 Q.   Can you turn to the next page with the

14 Bates number ending 341.

15 A.   Uh-huh.

16 Q.   Item 6 on that page reads: "You can

17 click the expanded item list box to see the

18 subitems (SKU, UPC, UPN, UPN1, NDC or vendor items)

19 in addition to the item itself."

20   What are subitems?

21 A.   Well, those are -- those are further

22 attributes on the -- well, all -- I believe SKU,

86

1   UPC, UPN, UPN1 and NDC are additional attributes on

2   the item master. Vendor items from the vendor item

3   table.

4   Q.   And where -- Is there somewhere shown on

5   the screen display on that page where you would

6   click to get the expanded item list?

7   A.   Yes.

8   Q.   Where is that?

9   A.   It's in the upper box, lower left

10 corner, the check box below the --

11 Q.   I see now. Okay.

12   Does that functionality exist in the

13 current version of Requisition Self-Service?

14 A.   Yes.

15 Q.   Can you turn to the next page with the

16 Bates number ending 342.

17 A.   Uh-huh.

18 Q.   No. 7 on that page reads: "Word finder

19 allows you to search using DME."

20   Do you see that?

21 A.   Uh-huh.

22 Q.   What is DME?

87

1   A.   I believe it stands for data mining

2   engine.

3   Q.   And how does the data mining engine

4   work? Can you explain it at a high level?

5   A.   It's a utility that IOS or our

6   environment level provides to access the Lawson

7   database tables.

8   Q.   What information can you search using

9   DME?

10 A.   If you have security rights, any table

11 in the suite of applications.

12 Q.   So can you search the vendor item table

13 using DME?

14 A.   From here, no. I mean, it's not

15 provided as part of the application.

16 Q.   What can be searched using DME from the

17 screen shown on this page?

18 A.   I believe it's the item master table.

19 Q.   So what additional information can you

20 search using that DME function in the item master

21 table?

22 A.   Nothing. It was provided as a -- If you

88

1   weren't sure of what to search on, it would allow

2   you to gather some possible terms to actually

3   search on. So when you click on it, it would

4   actually perform the search as if you had keyed it

5   into the search box.

6   MS. ALBERT: I'm informed by the

7   videographer that we're nearing the end of the

8   tape, so let's take a break to allow the tape to be

9   changed.

10   THE VIDEOGRAPHER: This marks the end of

11 Volume 1, Tape No. 1, in the deposition of Todd

12 Dooner. Going off the record. The time is

13 11:26 a.m.

14   (A recess was then taken.)

15   THE VIDEOGRAPHER: Back on the record.

16 Here marks the beginning of Volume 1, Tape No. 2,

17 in the deposition of Todd Dooner. The time is

18 11:34 a.m.

19 BY MS. ALBERT:

20 Q.   Going back to this DME functionality,

21 you indicated that if you weren't sure of the term

22 you wanted to search for, this functionality would

89

1   allow you to gather some possible terms and then

2   you said it performed the search as if you were

3   executing a keyword search; is that correct?

4   A.   Correct.

5   Q.   So when you use that word finder

6   functionality, the search engine will execute a

7   search against the search index and find the

8   references to the records in item master and

9   retrieve those items?

10   A.   DME will, yes.

11   Q.   Is that word finder functionality

12   present in the current version of Requisition

13   Self-Service?

14   A.   I'm not 100 percent sure. I would have

15   to look at the screen. I believe it is.

16   Q.   Can you turn to the page ending with the

17   Bates number 349. Item No. 5 on that page reads:

18   "The search field allows you to find an item on the

19   shopping list you're viewing. When you enter a

20   string of characters into the search box, a DME

21   call is executed and all items containing that

22   string of characters are returned."

91

1   shows the items for a particular shopping list that

2   I can't read there, but it's got the shopping list

3   name and description below the add all and add

4   selected buttons. Those are the items that are on

5   that shopping list.

6   Q.   Does the system go back and retrieve the

7   current item record from the item master for each

8   item on the shopping list?

9   A.   I believe it returns -- it gathers some

10   of the information from the item master.

11   Q.   What functionality is used to gather

12   item information from the item master with respect

13   to the items listed on a shopping list?

14   A.   I'm not sure I follow the question.

15   Q.   Is the same search engine used that's

16   used in keyword searching with respect to

17   retrieving the information from the item master for

18   shopping list items?

19   A.   No.

20   Q.   What functionality is used to retrieve

21   item data from the item master for shopping list

22   items?

90

1   How does this functionality differ, if

2   at all, from finding items using the keyword search

3   functionality?

4   A.   This is looking at a particular shopping

5   list or predefined set of items, and it's not using

6   the keyword list of fields to search from. It's

7   hard coded to search for a few of the fields on the

8   shopping list.

9   Q.   What fields on the shopping list does it

10   search for?

11   A.   I know item and description offhand.

12   Other than that, I don't know.

13   Q.   And then how does it go about retrieving

14   the item records from the item master database?

15   A.   They're retrieved from the shopping

16   list, the template list, rather than the item

17   master at this point. So this list is a predefined

18   shopping list.

19   Q.   So how do you bring up the item record

20   to populate your shopping cart using the shopping

21   list?

22   A.   If you look at the example above it, it

92

1   A.   Well, the shopping list is a predefined

2   list already. It's a predefined list of items.

3   You build a template or a shopping list in advance,

4   and those items on that shopping list are then

5   displayed here.

6   Q.   So if you had an item on the shopping

7   list -- Well, if you defined a shopping list, you

8   know, six months ago, could it be that some of the

9   data on that shopping list might be stale, like

10   cost information?

11   A.   I don't believe the cost is on the

12   template itself.

13   Q.   In the display shown on this page, it

14   has cost information. Do you see that column

15   labeled "Cost"?

16   A.   Yes.

17   Q.   How is that information retrieved for

18   the display?

19   A.   There is additional business logic being

20   performed against that predefined set of items.

21   Q.   What additional business logic is

22   performed?

93

1   A.   I don't know everything that's

2   happening, whether -- I don't know all the

3   information or all the details. I would have to

4   look at the source code to see everything.

5   Q.   What program in the source code is

6   associated with shopping list functionality?

7   A.   It's one of the RQI programs that we

8   went over earlier. It's G and H. I believe it may

9   be G and H, or H.

10   MS. ALBERT: Let me have the reporter

11   mark as Dooner Exhibit 4 a document entitled "P11

12   Requisitions Self-Service: What's New in Version

13   8.0.3?" It bears production numbers

14   LE02761084 through 113.

15   (Exhibit 4 marked for identification and

16   attached hereto.)

17   BY MS. ALBERT:

18   Q.   Are you familiar with the document

19   that's been marked as Dooner Exhibit 4?

20   A.   (Witness peruses document.)

21   I don't recall in detail, but my name is

22   on it, so...

94

1   Q.   Is this a presentation that you gave?

2   A.   I don't remember giving it, but it

3   appears that way, yes.

4   Q.   Do you know if this is another example

5   of a presentation from a CUE meeting?

6   A.   That's what I believe it would be from,

7   yes.

8   Q.   And this particular presentation was

9   given at the April 2004 CUE meeting; is that

10   correct?

11   A.   Yes.

12   Q.   Who is Barbie Sokol?

13   A.   She's a Lawson employee.

14   Q.   What's her position?

15   A.   I don't know today.

16   Q.   Is she still employed by Lawson?

17   A.   Yes.

18   Q.   Does she still have responsibilities in

19   connection with Requisition Self-Service?

20   A.   Not that I'm aware of, no.

21   Q.   Do you know -- Do you know whether she

22   has -- Strike that.

95

1   What was her position in April of 2004?

2   A.   I don't know.

3   Q.   Do you recall the general nature of her

4   responsibilities in that time frame?

5   A.   I believe she was an analyst, a business

6   analyst.

7   Q.   What are the responsibilities of a

8   business analyst?

9   A.   Gather -- Understanding client needs and

10   translating them into how Lawson may implement that

11   into the software.

12   Q.   Can you turn to the page in Exhibit 4

13   with the production number ending 1086.

14   A.   Uh-huh.

15   Q.   Do you see punchout listed on this page?

16   A.   Yes.

17   Q.   Was punchout a new product feature

18   in 2004?

19   A.   I don't know.

20   Q.   Do you recall when the punchout

21   application was introduced?

22   A.   I do not.

96

1   Q.   Do you recall any new features

2   associated with punchout that were released

3   in 2004?

4   A.   No.

5   Q.   Can you turn to the page with the Bates

6   number ending 1089.

7   A.   Uh-huh.

8   Q.   And the screen display on this page is

9   labeled "Company IC01.1." What is the purpose for

10   this screen?

11   A.   This is defining the company record.

12   Q.   And what's the company record used for?

13   A.   This is a -- It's an additional grouping

14   of things that will reside under a particular

15   company.

16   Q.   So can you use this screen to define the

17   tasks that members of this company are authorized

18   to perform?

19   A.   With regard to what?

20   Q.   With regard to Requisition Self-Service?

21   A.   Yes.

22   Q.   Down below the part on the form labeled

97

1 "Tasks Allowed," the bottom section of the form is

2 labeled "Item List Specific Field," and it has list

3 only contract items or list only internal items.

4   What's that part of the field -- What's

5 that part of the form used for?

6   A.   Requisition Self-Service.

7   Q.   What's the purpose for those particular

8 functionalities in that section of the form?

9   A.   It will filter the items that will be

10 shown within Requisition Self-Service.

11   Q.   So if we had enabled list only contract

12 items, would that mean that the requesters

13 associated with this particular company would be

14 authorized to only access contract items as opposed

15 to internal items?

16   A.   It would depend on what the internal

17 item was set to, I guess.

18   Q.   If the internal items was set to "no"

19 and the contract items was set to "yes," would that

20 mean that the requesters associated with this

21 particular company would be authorized to only

22 access contract items as opposed to internal items?

99

1 internal items field is set to "no"?

2   A.   Well, it would first have to look at the

3 requester's defaults to determine what the settings

4 were there. And if they did not have settings

5 provided, then we would default to the company

6 settings.

7   Q.   So in addition to defaults by company,

8 you can also set up defaults by specific requester?

9   A.   Yes.

10   Q.   And is that screen shown on the next

11 page with the Bates number ending 1090?

12   A.   Yes.

13   Q.   And for a particular requester, the

14 requester settings override the company settings?

15   A.   Yes.

16   Q.   On that screen, what do the different

17 numbers 1, 2, 3, 4, 5, 6, under tasks allowed

18 indicate?

19   A.   Those are the order that they will show

20 up in the drop-down in Requisition Self-Service.

21   Q.   And what if a particular requester was

22 not allowed to utilize one of those tasks? What

98

1   A.   Not necessarily, no.

2   Q.   What would it mean?

3   A.   It would mean that's the default for

4 your company.

5   Q.   And what tasks are associated with that

6 default?

7   A.   Requisition Self-Service tasks.

8   Q.   And if you had the default list only

9 contract items set to "yes" and list only internal

10 items set to "no," what specifically is enabled in

11 that default setting?

12   A.   You are setting the default for that

13 particular company. Requisition Self-Service will

14 interpret those fields.

15   Q.   How does Requisition Self-Service

16 interpret when the list only contract items is set

17 to "yes" and the list only internal items field is

18 set to "no"?

19   A.   Can you repeat that? Sorry.

20   Q.   How is the Requisition Self-Service

21 application interpreted when the list only contract

22 items field is set to "yes" and the list only

100

1 would be next to that task? Would there be an N?

2   A.   There would be a blank field.

3   Q.   Can you turn to the page with the Bates

4 number ending 1092.

5   A.   Uh-huh.

6   Q.   And the screen shown on this page is

7 labeled "User Personal Profile and Web Name." What

8 is this screen used for?

9   A.   In this example it was associating the

10 requester with a particular user ID, your default

11 requester.

12   Q.   And what are the different ID types that

13 can be associated with a particular user? Here

14 it's shown administrator. Are there other ID

15 types?

16   A.   There are. And I don't recall offhand.

17 This screen is not used anymore.

18   Q.   Is there a corollary screen for defining

19 a user personal profile with the current version of

20 Requisition Self-Service?

21   A.   This isn't part of Requisition

22 Self-Service. This is a --

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1   Q.   What is this screen? What application

2   is the screen associated with?

3   A.   It's not even an application. It's more

4   user setup information. But it is delivered with

5   the core applications.

6   Q.   Which core applications is it delivered

7   with?

8   A.   Depending on what you purchase.

9   Q.   So is there some type of form that

10   enables you to set up user personal profiles

11   currently with the Lawson S3 Procurement

12   applications?

13   A.   Yes.

14   Q.   And are there particular roles that can

15   be assigned to each user, such as requester,

16   approver, administrator?

17   A.   There are roles. But they don't play a

18   role in the application. The only thing we looked

19   on in this form is the requester and the product

20   line. This is used by other applications as well.

21   Q.   Is there, in connection with the

22   Procurement applications, some means to define

103

1   label the first alpha user field as vendor name,

2   could that be set up as a user-defined field?

3   A.   I don't know the field size there so...

4   Q.   Well, assuming that it didn't go over

5   the number of characters for that field size.

6   A.   Sure. It's free-form text. You can put

7   whatever you want.

8   Q.   And then what would you use to go about

9   actually associating that field with the fields of

10   the item records in the item master?

11   A.   Nothing. These are fields of the item

12   master.

13   Q.   Okay. So if you have a user-defined

14   field, how do you ensure that when the keyword

15   search setup program is run, that it pulls the data

16   from the field that you want it to pull from in the

17   item master?

18   A.   You set the usage flag on the screen as

19   used or not used.

20   Q.   Can you turn to the page with the Bates

21   number ending 1097. And the title of the display

22   on this page is "Keyword Search Load IC800."

102

1   roles for a particular user such as a requester

2   role and approver role?

3   A.   You can secure bookmarks to the various

4   applications through the Lawson portal.

5   Q.   Can you turn to the page with the Bates

6   number ending 1095.

7   A.   Uh-huh.

8   Q.   And the title of this screen is "Keyword

9   Search Setup IC00.5." What is this screen used

10   for?

11   A.   This is where you would define which

12   keywords you want to be able to search against

13   within RSS.

14   Q.   And do you see at the bottom of the

15   left-hand column there is first alpha user field,

16   second alpha user field, et cetera?

17   A.   Uh-huh.

18   Q.   Can you -- Using those user-defined

19   fields, can you set up additional item attributes

20   that you want to make searchable?

21   A.   Yes.

22   Q.   And, for example, if a user wanted to

104

1   A.   Yeah.

2   Q.   What is the IC800 program used for?

3   A.   It will build keywords -- build the

4   keyword tables based on the specified keyword -- or

5   the designated keyword fields that you've chosen.

6   Q.   And then those keyword tables, those are

7   the indexes that have references back to the item

8   records in the item master?

9   A.   Correct.

10   Q.   Can you turn to the next page labeled --

11   with the Bates number ending 1098.

12   A.   Uh-huh.

13   Q.   And that screen display on that page is

14   labeled "UNSPSC Product Codes IC16.1."

15   A.   Uh-huh.

16   Q.   What is the IC16.1 program used for?

17   A.   It's used to define UNSPSC codes.

18   Q.   And how would you go about actually

19   doing that?

20   A.   You would key them in by hand just from

21   the screen.

22   Q.   Is there a utility associated with the

105

1 software that enables you to load UNSPSC product

2 codes?

3   A.   I believe there is, yes.

4   Q.   What is that utility?

5   A.   I think it's IC816.

6   Q.   And this IC16.1 utility, that comes with

7 the software as delivered; is that correct?

8   A.   Yes.

9   Q.   Can you turn to the next page with the

10 Bates number ending 1099. The display on that page

11 is labeled "Item Master IC11.1."

12   How is this screen used?

13   A.   This is used to define items.

14   Q.   So would you have one of these screens

15 for each specific item number from the item master?

16   A.   Yeah. This is interfacing with the item

17 master.

18   Q.   And do you see the portion of the screen

19 at the bottom labeled "Item Code"? It has segment,

20 family, class, commodity.

21   A.   Yes.

22   Q.   What is that section of the screen used

107

1 "recorded."

2   Do you see that?

3   A.   Yes.

4   Q.   And below that there is "Procurement,

5 Requisitions Self-Service." It also indicates that

6 was recorded.

7   A.   Yeah.

8   Q.   Do you know what these are referring to?

9   A.   I would assume training material.

10   Q.   Is there somewhere within Lawson where

11 recorded training sessions are maintained?

12   A.   Yes.

13   MS. ALBERT: I'm going to make a request

14 of your counsel to produce those training sessions.

15   MR. SCHULTZ: I'll look into that.

16 BY MS. ALBERT:

17   Q.   Does WBT stand for web-based training?

18   A.   I believe so, yes.

19   MS. ALBERT: Let me have the reporter

20 mark as Dooner Exhibit 5 a document entitled

21 "Application Design Document for S3 Item Search

22 Center." It bears production number

106

1 for?

2   A.   Used to define the UNSPSC codes that you

3 want to associate with that item. They must be

4 already defined.

5   Q.   What do you mean, "they must be already

6 defined"?

7   A.   Those values will have to exist in the

8 UNSPSC table that you must populate.

9   Q.   So do you build the UNSPSC table using

10 IC16.1?

11   A.   Yes.

12   Q.   And then you would pull data from that

13 table to populate the item codes for each specific

14 item record in the item master?

15   A.   Yes.

16   Q.   Can you turn to the page with the Bates

17 number ending 1110.

18   A.   1110. Yes.

19   Q.   Do you see at the top of the page

20 there's two items under "Additional Training"? One

21 is "Procurement Punchout 8.0.3." And then there's

22 "WBT Identification Number," and it says

108

1 LE00192055 through 2062.

2   (Exhibit 5 marked for identification and

3 attached hereto.)

4 BY MS. ALBERT:

5   Q.   Are you familiar with the document

6 that's been marked as Dooner Exhibit 5?

7   A.   (Witness peruses document.)

8   I have never seen it, no.

9   Q.   Is there a standardized type of document

10 called an application design document used in

11 connection with the development of software

12 applications within Lawson?

13   A.   In some instances, yes.

14   Q.   What's the purpose of an application

15 design document?

16   A.   To outline a particular feature

17 enhancement.

18   Q.   Do you see on the first page there is a

19 reference to a Dave Christianson?

20   A.   Yes.

21   Q.   Do you know Mr. Christianson?

22   A.   Yes.

109

1   Q.   What is his position?

2   A.   I believe he's also a -- I don't know

3 his exact title but he's a software developer.

4   Q.   Does he have responsibilities for the S3

5 Procurement applications?

6   A.   He's part of that team, yes.

7   Q.   Is he part of your team that you work

8 with?

9   A.   No.

10   Q.   What team is he a part of?

11   A.   The S3 procurement team. The 4GL side.

12   Q.   Is he still employed at Lawson?

13   A.   Yes.

14   Q.   Can you describe to me the various

15 phases of the process by which new functionality is

16 added to a Lawson application?

17   A.   That can vary greatly.

18   Q.   Are there standardized phases of

19 development project that you go through?

20   A.   In some cases, yes.

21   Q.   In what cases?

22   A.   If formal documentation is written.

110

1   Another instance is it may be somebody's

2 idea in doing some research that may end up turning

3 into a future functionality.

4   Q.   In what circumstances is formal

5 documentation written?

6   A.   I would say generally if the -- Well, I

7 guess I don't know the exact circumstances when it

8 would be written but...

9   Q.   Have you ever had projects that you have

10 worked on that have had formal documentation

11 written?

12   A.   Sure.

13   Q.   In what circumstances did that occur?

14   A.   I'm not sure I understand the question.

15   Q.   In your -- In your position when you've

16 had these projects that have had formal

17 documentation written, what were the circumstances

18 why formal documentation was required for those

19 specific projects?

20   A.   I guess if it was handled from a

21 business analyst to document all necessary changes

22 and provide them to the programmer.

111

1   Q.   In the circumstances where you have

2 formal documentation, are there particular phases

3 of the formal documentation that you go through?

4   A.   Yeah.

5   Q.   What's the first phase, the initial

6 phase?

7   A.   I guess identifying the need or business

8 problem.

9   Q.   And is there a particular document

10 that's generated where you document the business

11 problem that's been identified?

12   A.   Normally they come in as enhancement

13 requests from clients or gathered through user

14 exchanges and that type of event.

15   Q.   Once you've gathered an enhancement

16 request from a client that you want to act further

17 upon, what would be the next phase of that project?

18   A.   Probably research from a business

19 analyst to identify how it may impact current

20 products.

21   Q.   Is there a particular formalized

22 document that's developed that would describe the

112

1 research that was conducted by the business

2 analyst?

3   A.   I don't know if there is a formal

4 document. There may be a template to write notes

5 and information in. I don't know that there is any

6 formalized questions that they go through or...

7   Q.   Is there a name associated with the

8 document that would be generated by a business

9 analyst?

10   A.   I don't know the names of the documents.

11   Q.   So once the business analyst had

12 conducted research and had identified how a

13 particular enhancement request would impact the

14 products, what would be the next phase in the

15 project if you decided to move forward with that

16 enhancement request?

17   A.   Well, there would probably be some

18 reviews of the document to discuss issues, concerns

19 with their proposal, how it may impact the

20 products.

21   Q.   And then if you decided to go forward

22 with that enhancement request, what would be the

113

1 next phase to move forward after the business

2 analyst had identified any product impacts?

3   A.   As long as the project is approved in a

4 document from the analyst, it would probably be

5 turned over to the programmers, programmer or

6 programmers.

7   Q.   And what would the programmers -- What

8 would be the first step that the programmers would

9 do with that enhancement request?

10   A.   Read it. Understand it.

11   Q.   And if you wanted to go about

12 implementing the enhancement request, what would be

13 the next phase of the project?

14   A.   Coding.

15   Q.   Is there any kind of design

16 documentation or functional specifications that are

17 developed for the enhancement request prior to

18 coding?

19   A.   Well, I think that's what we were

20 talking about here.

21   Q.   Well, I'm trying to figure out when an

22 application design document, at what stage in a

114

1 project you would prepare that type of

2 documentation.

3   A.   I mean, this would be done up front

4 ideally. That's not always the case in software

5 development, but...

6   Q.   So would the programmers create the

7 application design document, or would it be created

8 by a business analyst?

9   A.   It could be either.

10   Q.   And once you have an application design

11 document, what would be the next phase that you

12 would undertake in order to implement the

13 enhancement request?

14   A.   Again, they would read it, understand

15 it, ask questions.

16   Q.   Is there any other formal documentation

17 prepared following an application design document

18 but before you actually do the coding?

19   A.   Not that I'm aware of.

20   Q.   Is there something called a product

21 development requirements document that would be

22 generated?

115

1   A.   I believe that may come from the product

2 donors or the Keith Lohkamps, the owner of the S3.

3 I don't know his exact title.

4   Q.   Where does the product development

5 requirements document fit within --

6   A.   Those are the enhancements, basically,

7 identified in detail.

8   Q.   The business identification of the

9 enhancements, how does it compare to a design

10 document?

11   A.   The business identification, what is the

12 problem and possible solution here. It's an

13 overview of the issue without getting into the

14 software end of it.

15   Q.   Once the programmers engage in the

16 coding, what would be the next step after the code

17 is generated in a development project?

18   A.   You would test it.

19   Q.   Is there a test script that's generated?

20   A.   No.

21   Q.   Would there ever be a test script

22 generated for a product enhancement?

116

1   A.   I'm not sure what you mean by "test

2 script."

3   Q.   Do you have to go -- Do you have to test

4 the enhancement through various use case scenarios?

5   A.   Possibly, yes.

6   Q.   And would you develop a script in order

7 to run through all of those use case scenarios?

8   A.   In some scenarios, yes.

9   Q.   Once you engage in the testing, what

10 would be the next phase in the enhancement

11 development?

12   A.   Hand it over to the QA department.

13   Q.   What does the QA department do?

14   A.   Further testing.

15   Q.   Is there a beta phase when this new

16 functionality is incorporated into a product?

17   A.   There can be.

18   Q.   In what circumstances would you have a

19 beta phase?

20   A.   I don't know the details behind when we

21 would or wouldn't.

22   Q.   Okay. So you have a testing phase. And

117

1   at what point is the new functionality made

2   commercially available?

3   A.   It would depend on the delivery

4   mechanism decided.

5   Q.   What are the different delivery

6   mechanisms that are possible?

7   A.   Usually new features are put out at

8   major release dates, service packs, based on a

9   schedule or road map that Lawson has for various

10   projects.

11   Q.   What's a service pack?

12   A.   It's a point in time where we cut off

13   code and package it to deliver.

14   Q.   And that might occur in situations other

15   than where you have a major release; is that

16   correct?

17   A.   Service packs are generally for bug

18   fixes, not really for enhancements. But depending

19   on the size of the enhancement, they may be

20   released at that point as well.

21   Q.   And how often do major releases occur?

22   A.   I believe we do it twice a year now.

119

1   Q.   Are there any product enhancements

2   associated with the Inventory Control application

3   for the next scheduled major release?

4   A.   I wouldn't know that answer.

5   Q.   Who would know that?

6   A.   Probably Dave Christianson.

7   Q.   Are there any product enhancements

8   associated with the Requisitions application that

9   are scheduled for the next major release date?

10   A.   I wouldn't know that as well.

11   Q.   Who would know that?

12   A.   I would point to Dave Christianson

13   again.

14   Q.   Are there any product enhancements

15   associated with the Purchase Order application

16   scheduled for the next major release date?

17   A.   I don't know.

18   Q.   Who would know that?

19   A.   Dave Christianson.

20   Q.   Now, turning to the document that was

21   marked as Exhibit 5, can you turn to the page with

22   the Bates number ending 56.

118

1   Q.   So what was the last major release date?

2   A.   I don't know the exact date. It was

3   fall of 2009.

4   Q.   When is the next scheduled release date?

5   A.   I believe it's the May time frame. And

6   not all products will participate. It's...

7   Q.   Are there any product enhancements that

8   are going to be delivered in the next scheduled

9   release date with respect to Requisitions

10   Self-Service?

11   A.   Would you repeat that?

12   Q.   Are there any product enhancements that

13   are going to be delivered in the next major release

14   scheduled for May that relate to the Requisition

15   Self-Service application?

16   A.   Yes.

17   Q.   What are those product enhancements?

18   A.   They're minor enhancements. I don't

19   recall even off the top of my head.

20   Q.   Do you recall what they relate to?

21   A.   Not off the top of my head right at this

22   moment.

120

1   A.   Yeah.

2   Q.   On that page is the revision history for

3   the document. Is there any way to tell if the

4   product enhancements discussed in this document

5   have been implemented in the commercial product?

6   A.   From this document?

7   Q.   Right.

8   A.   Not that I'm aware of, no.

9   Q.   Can you turn to the page with the Bates

10   number ending 58. Do you see at the top of that

11   page there's the words "Targeted Releases," and it

12   indicates 9.01 and forward?

13   A.   Yes.

14   Q.   Has release 9.01 been commercially --

15   made commercially available?

16   A.   I believe so, yes.

17   Q.   And up at the top to the right of the

18   words "Release Notes" the document states: "This

19   enhancement involves adding the capability to

20   search for item information from S3 database tables

21   within the Smart Office UI."

22   Do see that?

121

1   A.   Yes.

2   Q.   Do you know if that functionality has

3   been made available in the commercial product?

4   A.   That I do not know.

5   Q.   Who would know?

6   A.   Dave Christianson.

7   Q.   Do you know how the functionality

8   associated with searching for item information from

9   S3 database tables within the Smart Office user

10   interface differs from the search catalog task?

11   A.   I would have to see the search mechanism

12   you're using. I mean, if you're talking the 4GL

13   applications, there is no difference.

14   Q.   Under the heading "Overview," the first

15   sentence under that reading reads: "This

16   enhancement involves adding the capability to

17   search for item information from S3 database tables

18   within the Smart Office user interface."

19   Do you know which S3 database tables are

20   being referred to there?

21   A.   Not based on that statement, no.

22   Q.   Can you turn to the page with the Bates

122

1   number ending 60.

2   A.   Yep.

3   Q.   And under the heading "S3 Item Search,"

4   the text reads: "The S3 Item Search Center adds

5   the capability to search for item information

6   within the item master (ITEMMAST table), item

7   location (ITEMLOC table), and vendor item

8   (POITEMVEN table). The table below lists the

9   database tables and fields that are searchable."

10   Are these the database tables that the

11   search engine will conduct the search against?

12   A.   It appears that way, yes.

13   Q.   Do you know if this functionality is

14   included in the current version -- current

15   commercial version of the product?

16   A.   I think this document is referring to

17   Lawson Enterprise Search.

18   Q.   What is Lawson Enterprise Search?

19   A.   It's a new product offering.

20   Q.   Is it included with the S3 Procurement

21   applications?

22   A.   I believe you have to purchase a

123

1   separate license.

2   Q.   How does the functionality of the Lawson

3   Enterprise Search differ from the search

4   functionality included with Requisition

5   Self-Service?

6   A.   It's a completely separate product that

7   accesses the database tables.

8   Q.   And once you conduct a search using this

9   Lawson Enterprise Search, for what purpose do you

10   use the search results?

11   A.   Multiple purposes, I guess, depending on

12   what you're searching on.

13   Q.   What are the purposes for which you can

14   use the search results from the Lawson Enterprise

15   Search application?

16   A.   You may search for an employee name.

17   You only know his first name, and you get a list of

18   all employees with a certain name. It would allow

19   you to do a Google search-type thing only through

20   your Lawson data while you retrieve a list of those

21   names, and then to transfer, if set up that way, to

22   the particular HR form to view additional

124

1   information.

2   Q.   What are the purposes for which you

3   could use data from the item master table, the item

4   location table and the item vendor table -- Let me

5   rephrase that.

6   What are the purposes for which you

7   could use the data resulting from searches using

8   the Lawson Enterprise Search where the searches are

9   conducted against the item master table, the item

10   location table and the PO item vendor table?

11   A.   The idea being if you don't know the

12   exact information to view it in either IC11 or IC12

13   or PO13, you can do an Enterprise search that will

14   then allow you to transfer to those 4GL forms.

15   You may be making an item inactive for

16   some reason, they had a recall on it, or you need

17   to update some information on that individual item.

18   So it's just maintaining those items in their

19   tables.

20   Q.   Can you use the Lawson Enterprise Search

21   in order to search for items in the item master in

22   order to build a requisition?

125

1   A. No.

2   MS. ALBERT: Off the record for a

3   second.

4   THE VIDEOGRAPHER: Going off the record.

5   The time is 12:28 p.m.

6   (A recess was then taken.)

7   THE VIDEOGRAPHER: Back on the record.

8   The time is 1:17 p.m.

9   MS. ALBERT: Let me have the reporter

10   mark as Dooner Exhibit, 6 a copy of a document

11   entitled "Purchase Order: Streamlining the

12   Purchasing Process," bearing production numbers

13   ePlus 0241302 through 03.

14   (Exhibit 6 marked for identification and

15   attached hereto.)

16   BY MS. ALBERT:

17   Q.   Mr. Dooner, have you ever seen the

18   document that's been marked as Dooner Exhibit 6

19   before?

20   A.   Not this particular one, no.

21   Q.   Do you know what this Exhibit 6 is? Is

22   it marketing material of some sort?

126

1   A.   It appears to be some sort of marketing

2   material.

3   Q.   And does it relate to the purchase order

4   application of the S3 procurement suite?

5   A.   Yes.

6   Q.   Do you know if this document can be

7   found on Lawson's website?

8   A.   I would assume so. I'm not sure. It

9   looks like it references the website on page -- on

10   the second page.

11   Q.   This document in the second paragraph

12   indicates that Lawson purchase order helps you

13   create and issue purchase orders, maintain your own

14   item catalog and manage the receiving process.

15   Is that still accurate as relates to the

16   current application?

17   A.   I would -- I don't quite understand

18   "maintain your item catalog." But the rest of it,

19   yes.

20   Q.   What don't you understand about that

21   statement?

22   A.   Well, the item catalog is part of the

127

1   inventory control.

2   Q.   So you think it would be better

3   described as part of the inventory control rather

4   than the purchase order application?

5   A.   Based on the context there, yes. Just

6   my view.

7   Q.   In the paragraph that bridges from the

8   bottom of the left-hand column over to the top of

9   the right-hand column, the first full sentence in

10   the right-hand column reads: "Purchase order

11   provides realtime information about item

12   availability and logistical requirements."

13   Can you describe how the purchase order

14   application provides realtime information about

15   item availability?

16   A.   I do not know how that's done through

17   the purchase order system.

18   Q.   Is that done through the Inventory

19   Control application?

20   A.   I guess it depends on what piece of

21   information we're gathering here.

22   Q.   Do you have any knowledge about how the

128

1   applications in the S3 Procurement suite include

2   functionality to provide realtime information about

3   item availability?

4   A.   Yeah. Part of the inventory control, I

5   believe there is a screen that you can see item

6   availability.

7   Q.   And from where does that data -- where

8   is that data maintained?

9   A.   Well, the data is maintained in various

10   systems, but it's -- the end result of availability

11   is shown with inventory control.

12   Q.   Where is data relating to -- What

13   database is maintained data relating to item

14   availability?

15   A.   Well, it would be the Lawson application

16   database.

17   Q.   How is the information maintained --

18   that's maintained about item availability, from

19   what data source does that information come?

20   A.   It would be many data sources depending

21   on which supply chain modules you are using, I

22   would say.

129

1   Q.   If you had a system that included the

2 Inventory Control module, the Purchase Order module

3 and Requisitions module, from what -- from where

4 does information about item availability come?

5   A.   From all three of those systems. I

6 don't know those particular files, if that's what

7 you're asking.

8   Q.   Who would know how the item availability

9 capability works?

10   A.   No one probably off the top of their

11 head. They would have to see how we're calculating

12 that value.

13   Q.   Is there a particular program or utility

14 that you would turn to in order to determine how

15 the functionality relating to item availability

16 works?

17   A.   Not off the top of my head. I would

18 have to do some research.

19   MS. ALBERT: I would have the reporter

20 mark as Dooner Exhibit 7 a document entitled

21 "Lawson Software e-Procurement: Revolutionizing

22 the Healthcare Supply Chain." It bears production

130

1 numbers LE00163483 through 502.

2   (Exhibit 7 marked for identification and

3 attached hereto.)

4 BY MS. ALBERT:

5   Q.   Mr. Dooner, have you ever seen the

6 document that's been marked as Dooner Exhibit 7

7 prior to today?

8   A.   (Witness peruses document.)

9   Not to my recollection, no.

10   Q.   Do you know if Lawson's White Papers are

11 maintained on the Lawson.com website?

12   A.   I do not know where they're maintained.

13   Q.   In what circumstances is a Lawson White

14 Paper prepared?

15   A.   Don't know.

16   Q.   Do you know who is responsible for

17 preparing Lawson White Papers?

18   A.   I do not.

19   Q.   Can you turn to the page with the Bates

20 number ending 487. In the right-hand column

21 labeled "A complete Integrated e-Procurement

22 Solution," the first sentence in the second

131

1 paragraph reads: "The Lawson.insight

2 e-Procurement service is a hosted e-service

3 solution that addresses the specific needs of the

4 healthcare industry."

5   Does Lawson currently provide hosted

6 e-Procurement services for some clients?

7   A.   I don't know what they mean by hosted

8 e-service solution other than their Requisition

9 Self-Service application.

10   Q.   Does Lawson currently provide hosted

11 services relating to the Requistion Self-Service

12 application for some of its clients?

13   A.   Not that I'm aware of, no.

14   Q.   Are you aware that Mr. Lohkamp testified

15 that Lawson in fact provides hosted services for

16 some of his procurement clients?

17   A.   No.

18   Q.   Who would I ask about hosted services

19 provided by Lawson with respect to procurement

20 solutions?

21   A.   I would go back to Keith Lohkamp.

22   Q.   Can you turn to the page with the Bates

132

1 number ending 489. Under the left-hand column

2 entitled "e-Procurement," the third paragraph,

3 No. 3 under that heading reads: "Upon receiving

4 the order via the Internet (or extranet) the vendor

5 sends back information to electronically update the

6 hospital's ordering system with current pricing,

7 availability and delivery details, thus ensuring a

8 seamless information match."

9   Do you know how the system function

10 works relating to receiving the availability

11 information back from the vendor? Do you know how

12 that's accomplished?

13   A.   I guess I don't know what context this

14 No. 3 is based in here. I don't understand what

15 it's referring to.

16   Q.   Are you familiar with a product that was

17 called e-Procurement at some point in time?

18   A.   I believe that is synonomous with

19 punchout.

20   Q.   And is there a mechanism that allows a

21 vendor that receives an order from a Lawson system

22 user to send back information to electronically

133

1   update the Lawson system regarding current pricing

2   and availability in the punchout application?

3   A.   It does not update anything at Lawson.

4   It's providing the information back to the

5   Requisition system.

6   Q.   Right. So back to the Lawson system?

7   A.   Back to the Requisition, the order that

8   you're creating. It's giving you the price for the

9   item that you ordered.

10   Q.   And what's the mechanism that a vendor

11   uses to convey the pricing and availability

12   information back to the Requisition system?

13   A.   That's a -- Well, I don't know about

14   availability, but they give us pricing information.

15   It's a cXML transaction or cXML file.

16   Q.   And that comes back in response to an

17   order that was transmitted by a user of the

18   Procurement Punchout application?

19   A.   It comes back from a shopping session on

20   the vendor's website, if you initiated it through

21   the Lawson requisition punchout process.

22   Q.   So that information is the information

134

1   that comes back from the vendor's website to

2   populate the shopping cart in the Requistion

3   Self-Service application; is that correct?

4   A.   Yes.

5   Q.   Can you turn to the page with the Bates

6   number ending 496. Under the paragraph labeled

7   "Role-Based Access," that sentence reads: "Manage

8   your procurement processes by granting selective

9   role-based access to purchasing information."

10   How can this be done in the Lawson

11   procurement system?

12   A.   We referred to the screens earlier. The

13   IC01 and the IC -- or RQ04 screens where you define

14   either at the company level or requester level

15   which tasks and which information are returned

16   within the RSS product.

17   Q.   Under the Paragraph 3 labeled "One to

18   Many Connection," the first sentence reads:

19   "e-Procurement service delivers out-of-the-box

20   connection to key suppliers and manufacturers."

21   How is that done?

22   A.   Nothing is out of the box. We've

135

1   established -- we've tested certain functionality

2   with a set of vendors that we provide a list of.

3   But out of the box, you're not going to have any

4   connection.

5   Q.   Why does it use the term "out of the

6   box" in this document?

7   A.   You would have to ask the person that

8   wrote it I guess. I would talk to the person that

9   authored the document. I don't know.

10   Q.   Are these connectors already precoded by

11   Lawson?

12   A.   We give you a shell. You need to

13   negotiate with those vendors to establish your own

14   connection. It's an individual connection between

15   client and vendor.

16   Q.   And will Lawson Professional Services

17   assist the client in establishing a punchout

18   connection to the vendors that it wants to conduct

19   business with?

20   A.   I don't know for sure if that's a role

21   they play.

22   MS. ALBERT: Let me have the reporter

136

1   mark as Dooner Exhibit 8 a document that's a

2   compilation exhibit, and I'll just have to refer to

3   the Bates numbers of the pages as we go through the

4   document.

5   (Exhibit 8 marked for identification and

6   attached hereto.)

7   MS. ALBERT: For the record, Lawson's

8   counsel identified the pages within Exhibit 8 as

9   falling within the Bates range of something counsel

10   identified as the RFP Express, or the Proposal

11   Automation Suite.

12   BY MS. ALBERT:

13   Q.   Are you familiar with either of those

14   terms?

15   A.   RFP, request for proposal.

16   Q.   Are you familiar with something called

17   an RFP Express?

18   A.   No.

19   Q.   Are you familiar with a repository

20   within Lawson that maintains standardized responses

21   to questions that you may receive from prospective

22   clients in requests for proposals?

137

1   A.   No.

2   Q.   Do you have any involvement in the

3 process of preparing responses to requests for

4 proposals?

5   A.   No.

6   Q.   No -- I mean, just for the record, these

7 pages, Bates numbers fall within the range of

8 something that counsel did identify as being either

9 the RFP Express or the Proposal Automation Suite in

10 a letter dated November 25, 2009, to me from Will

11 Schultz.

12   MR. SCHULTZ: Okay.

13 BY MS. ALBERT:

14   Q.   If you look at the first page of

15 Exhibit 8 with the production number L0261972, it

16 says that "Lawson provides the ability to create

17 product lists as well as download vendor catalogs."

18   What is provided by Lawson that enables

19 the download of vendor catalogs?

20   MR. SCHULTZ: I'll object as to

21 foundation and incomplete document.

22   MS. ALBERT: Well, the complete document

138

1 is thousands of pages long, so I only pulled the

2 pages that I was interested in.

3   MR. SCHULTZ: You may answer.

4   THE WITNESS: Could you repeat the

5 question. I'm sorry.

6 BY MS. ALBERT:

7   Q.   If you look at the first page, the first

8 sentence on that page reads: "Lawson provides the

9 ability to create product lists as well as download

10 vendor catalogs."

11   What is provided by Lawson that enables

12 the download of vendor catalogs?

13   A.   Nothing that I'm aware of.

14   Q.   Are you familiar with a program called

15 PO536?

16   A.   Yes.

17   Q.   What does that program do?

18   A.   I believe it will load vendor

19 agreements.

20   Q.   And what are vendor agreements?

21   A.   They are agreements with a vendor that

22 you have negotiated prices and items that you may

139

1 purchase from them.

2   Q.   So when it downloads vendor agreements,

3 will it download information about specific items

4 that are covered under an agreement that you may

5 have with the vendor?

6   A.   Again, Lawson wouldn't be providing the

7 download. I think it would be the vendor providing

8 the download.

9   Q.   Right. But in the PO536 program, is the

10 information that is downloaded using that program,

11 does it include item record data relating to items

12 that you have negotiated with a vendor that you

13 want to purchase?

14   A.   PO536 does not download anything.

15   Q.   What does it do?

16   A.   Loads information into the Lawson

17 database.

18   Q.   Okay. So using the PO536 program, is

19 the information that is loaded into the item master

20 database, does that include item record data

21 relating to items that you have negotiated with a

22 vendor that you want to purchase?

140

1   A.   It loads them into the vendor agreement

2 initially, and those would be -- They don't have to

3 be something you've negotiated. But they would

4 be -- Otherwise, why would you put them in your

5 system if you haven't negotiated it?

6   So it's something that you worked out

7 with the particular vendor as to a set of items

8 that you would purchase from them, or may purchase

9 from them.

10   Q.   And does the data that's loaded include

11 item descriptions?

12   A.   I believe so, yes.

13   Q.   Does it include prices for items?

14   A.   I believe so.

15   Q.   And will you associate a particular

16 vendor with those items under the contract?

17   A.   The items are from a particular vendor.

18   Q.   And will the information include unit of

19 measure concerning particular items?

20   A.   I would say yes.

21   Q.   Will it include -- Will it include the

22 cost for the items?

141

1   A.   I would say yes.

2   Q.   Can you turn to the next page of

3   Exhibit 8. That page bears production number

4   L0262041. And this page relates to the

5   implementation methodology to define the item

6   master file.

7   The last paragraph, the last two

8   sentences read: "This does not mean, however, that

9   all entities can see all items. The system can be

10   designed to filter what items a specific entity has

11   access to."

12   And how is that accomplished, that you

13   can filter the items that a specific entity has

14   access to?

15   A.   I think I would have to read the whole

16   paragraph to see the context but...

17   (Witness peruses document.)

18   My guess is they're referring to item

19   location records at that point. I don't --

20   Q.   How does the system filter what items a

21   specific entity has access to?

22   A.   In what -- What aspect of which

143

1   of thing.

2   Q.   Can you turn to the next page of

3   Exhibit 8. That page has production number

4   L0262044. Towards the middle of the paragraph

5   there is a sentence that reads: "By integrating

6   with vendor systems, your internal electronic

7   catalogs can be automatically updated with new

8   vendor pricing and availability information."

9   Do you know how a Lawson system -- how

10   the internal catalog of a Lawson system can be

11   automatically updated with vendor pricing and

12   availability information?

13   A.   I do not know how that's done.

14   Q.   Who would you ask if you wanted to find

15   out the answer to that question?

16   A.   I would probably start with Jill

17   Richardson.

18   Q.   What is Ms. Richardson's position?

19   A.   She's a business analyst.

20   Q.   Is there anyone within your group that

21   works on functionality relating to updating

22   internal electronic catalogs with information?

142

1   application?

2   Q.   With respect to the item master data.

3   A.   You can only see item master records for

4   the associated item group that you are

5   participating in.

6   Q.   So is that done with that corporate

7   group form that we discussed earlier?

8   A.   You need to define an item group, and

9   you would define a company, and a company is

10   associated with one item group.

11   Q.   So can some users be limited to only

12   having access to items associated with specific

13   vendor agreements?

14   A.   Not that I'm aware of.

15   Q.   Can some users be limited to only having

16   access to items of certain product types, such as

17   office products, for example?

18   A.   I mean, you may limit it based on a

19   template that they could see, or shopping list.

20   They may only see -- They may not see all shopping

21   lists for a particular company. They may only see

22   those shopping lists for their location, that type

144

1   A.   Not that I'm aware of, no.

2   Q.   Can you turn to the next page of

3   Exhibit 8 with the Bates number L0262059. That RFP

4   response states: "Lawson can associate an item on

5   the item master to a replacement item should the

6   primary item be discontinued or back ordered.

7   Leveraging Lawson's process flow application

8   enables replacement items to become the primary

9   automatically and serve notification to designated

10   individuals that this event occurred."

11   How is that functionality accomplished?

12   A.   I believe that's a client modification

13   that would happen using process flow. I don't

14   believe we deliver that out of the box. Process

15   flow is an application that they may purchase.

16   Q.   How can you set up an item in an item

17   master and associate that with a replacement item?

18   A.   I believe it was a field right on the

19   item master.

20   Q.   What field is that? Do you know the

21   name of that field?

22   A.   Replacement item. I mean, the label may

145

1   say replacement item. I don't know what the actual

2   field behind the scenes is called.

3   Q.   So when you conduct a search for that

4   item and you retrieve that item from the item

5   master, is it going to display to you that there is

6   a replacement item associated with that item?

7   A.   No.

8   Q.   When would this notification occur that

9   there was a replacement item associated with a

10 particular item that you're interested in in the

11 item master?

12   A.   What process are we talking about?

13   Q.   The notification that's referred to in

14 this paragraph.

15   A.   That would depend on the process flow

16 that was written as to how it would notify you.

17   Q.   Do you know any circumstance when the

18 notification that there is a replacement item would

19 occur?

20   A.   I don't believe it's part of the

21 requisition process. I think it had more to do

22 with the warehousing, which I'm not familiar with.

146

1   Q.   Is the warehousing function part of the

2   Inventory Control application?

3   A.   No. It's a separate module. It has to

4   do with fulfilling -- fulfillment of an order

5   versus -- if you sell products versus purchase

6   them, I believe.

7   Q.   When you retrieve an item record from

8   the item master, will the information that you pull

9   up include this field relating to replacement

10 items?

11   A.   No.

12   Q.   How could you view that information?

13   A.   Use IC11 data master maintenance screen.

14   Q.   Can you turn to the next page of

15 Exhibit 8. That page has Bates number L0262133.

16 The first two sentences on that page read: "The

17 Lawson system includes delivered

18 conversion/interface programs in each module.

19 These programs take data from standard flat files

20 and interface them into our database."

21   Are there conversion and interface

22 programs included with the S3 Procurement

147

1   applications?

2   A.   Yes.

3   Q.   What's the purpose of these

4   conversion/interface programs?

5   A.   The idea behind them is to take data

6   from a legacy system into -- import it into the

7   Lawson system.

8   Q.   In what circumstances would these

9   conversion programs be used?

10   A.   Moving from a legacy system into Lawson.

11   Q.   So for example, if a client had a prior,

12 you know, legacy procurement system that included

13 an item master, would you use these conversion

14 programs to take the data from that legacy system

15 item master and convert it to the proper format for

16 importing the data into the Lawson item master?

17   A.   No.

18   Q.   In what circumstances -- What types of

19 data would you use the conversion programs in

20 connection with?

21   A.   These programs do not convert the data

22 from a legacy system, they import it, once you have

148

1   put it into a format that we expect.

2   Q.   And what do you use to put the legacy

3   system data into the format that the Lawson system

4   expects?

5   A.   That's up to the client, any means they

6   choose.

7   Q.   Does Lawson provide any tools to the

8   client to assist them in putting the data into the

9   format that the Lawson system expects?

10   A.   No.

11   Q.   Does Lawson provide file format layouts

12 to assist in that process?

13   A.   Yes.

14   Q.   Can you turn to the page Bates-stamped

15 L0262307.

16   A.   Uh-huh.

17   Q.   The first paragraph on that page reads:

18 "Clients approach data conversion in one of two

19 ways. The first is for the client to utilize

20 Lawson's application program interfaces and upload

21 the data from a CSV file. This approach requires

22 the extraction of data from the legacy system in

149

1   Lawson's format."

2   The next paragraph reads: "The second

3   approach is for the client to utilize Lawson's

4   process flow integrator BL tool and Microsoft

5   add-ins."

6   Do you know which approach is used if a

7   client wants to import an existing item master and

8   the data in that item master from a legacy system

9   into a Lawson S3 inventory control and a master

10   database?

11   A.   They can do either approach, or they can

12   key the information in.

13   Q.   Do the Lawson APIs that are referenced

14   on that page, do those come with the Lawson

15   Procurement applications as delivered?

16   A.   Yes.

17   Q.   And what are some of those APIs that are

18   used for data conversion?

19   A.   I believe like IC11 is one of them for

20   the item master.

21   Q.   Can you turn to the last page of

22   Exhibit 8 bearing production number L0262843.

150

1   A.   Uh-huh.

2   Q.   The RFP response on that page reads:

3   "Substitute vendors for an item are available via

4   Lawson's Drill Around. This will provide a

5   dropdown list of substitute vendors for an item."

6   Where is this drill-around

7   functionality, where is that found?

8   A.   I have no idea what context this is

9   referring to. I don't know.

10   Q.   Can you conduct a search for an item in

11   the item master and then use the Lawson Drill

12   Around to find substitute vendors for the item that

13   you've retrieved?

14   A.   Could you repeat that question?

15   Q.   Can you conduct a search for an item in

16   the item master and then use this Lawson Drill

17   Around feature to find substitute vendors for the

18   item that you've retrieved from the item master?

19   A.   I mean, from the item master, I believe

20   you can see the associated vendor items with that

21   item master record. You can't do any processing at

22   that point; you're just viewing information. You

151

1   can't create an order or anything from that. This

2   is just -- Those are maintenance screens.

3   Q.   So the Lawson Drill Around feature is

4   available in the maintenance screens?

5   A.   Again, it's available -- it's possible

6   to use it in any Lawson application form. It's

7   whether it's enabled, whether the programmer at the

8   time that application form was written.

9   Q.   Can it be used in connection with the

10   keyword search user interface of the Requistion

11   Self-Service?

12   A.   No.

13   Q.   So what do you mean that it can be used

14   in any Lawson application form?

15   A.   Lawson 4GL application form. And Drill

16   Around is a feature of Lawson applications that's

17   provided by all 4GL applications.

18   Q.   So it comes in the Requisitions module

19   versus the Requistion Self-Service module?

20   A.   Correct.

21   MS. ALBERT: Let me have the reporter

22   mark as Dooner Exhibit 9 a document entitled

152

1   "Functional Specification: Adapter

2   Inbound/Outbound Modifications Platform Summary

3   Release." It bears production numbers

4   LE00195079 through 98.

5   (Exhibit 9 marked for identification and

6   attached hereto.)

7   BY MS. ALBERT:

8   Q.   Are you familiar with the document

9   that's been marked as Dooner Exhibit 9?

10   A.   (Witness peruses document.)

11   I've never seen it before.

12   Q.   To whom are functional specifications

13   distributed?

14   A.   Don't know.

15   Q.   At what stage in the development process

16   are functional specifications prepared?

17   A.   I have no idea.

18   Q.   Can you turn to the page with the Bates

19   number ending 83.

20   A.   Uh-huh.

21   Q.   The first sentence under the heading

22   "Overview" reads: "The purpose of this document is

153

1 identifying changes in adapter to support master

2 data import."

3   Do you know what's meant by the term

4 "adapter" as used there in that sentence?

5   A. I have no idea what this document is

6 referring to.

7   Q. Do you know what is meant by the term

8 "master data import"?

9   A. I do not.

10   Q. Could you turn to the next page with the

11 Bates number ending 84. The heading on that -- The

12 sentence under the heading "Item" indicates that

13 item import is modified to capture some additional

14 fields that are referenced there.

15   Do you know whether this relates to data

16 in the item master tables?

17   A. It appears -- On the left-hand column,

18 Lawson field name, it looks like it's referring to

19 Lawson information. Hexion, I'm assuming that's a

20 third-party application. I have no clue what -- I

21 have no clue what this document is referring to.

22   Q. Can you turn to the page with the Bates

154

1 number ending 92. And on that page there's some

2 interface table schema. It indicates that "Master

3 data import requires the following staging tables."

4   Do you have any familiarity with what

5 staging tables are used for?

6   A. No.

7   MS. ALBERT: Let me have the reporter

8 mark as Dooner Exhibit 10 a document entitled

9 "Lawson Requisitions Self-Service Installation

10 Guide." It bears production numbers LE03258750

11 through 766.

12   (Exhibit 10 marked for identification and

13 attached hereto.)

14 BY MS. ALBERT:

15   Q. Are you familiar with the document

16 that's been marked as Dooner Exhibit 10?

17   A. (Witness peruses document.)

18   I've seen similar documents, yes.

19   Q. What's the purpose for the Requistion

20 Self-Service installation guide?

21   A. To aid a client in installing Requistion

22 Self-Service.

155

1   Q. Do you know who has responsibilities for

2 authoring this document?

3   A. A number of people, myself included.

4   Q. Do you know if this is the most recent

5 version of the Requistion Self-Service installation

6 guide?

7   A. I don't think it is, no.

8   Q. What causes you to think that it's not

9 the most recent version?

10   A. The date.

11   Q. What's the current version for

12 Requistion Self-Service that's commercially

13 available?

14   A. 9.01.

15   MS. ALBERT: I just would ask Lawson

16 counsel, I don't believe we have the installation

17 guide for 9.01. So if a copy of that could be

18 produced.

19   MR. SCHULTZ: I will look into that.

20   MS. ALBERT: We are requesting that.

21 BY MS. ALBERT:

22   Q. Does Lawson provide services to assist

156

1 its clients in connection with the installation of

2 Requistion Self-Services?

3   A. I believe they can be purchased by a

4 client, yes.

5   Q. Can you turn to the page with the Bates

6 number ending 754.

7   A. Yep.

8   Q. And just overall in this document, does

9 this have a step-by-step description of the process

10 that a client would use to go about installing the

11 Requistion Self-Service application?

12   A. That's the general idea, yes.

13   Q. And on the page with the Bates number

14 ending 754 there is a heading "Network

15 Configurations," and it indicates that Lawson

16 suggests that you install Lawson Requistion

17 Self-Service in one of the following

18 configurations, and it shows two different

19 configurations there.

20   Why does Lawson make specific

21 recommendations on network configurations for

22 Requistion Self-Services?

157

1   A.   I believe this is just a general

2   architecture that's supported by Lawson, not

3   necessarily Requistion Self-Service --

4   Q.   Why do you --

5   A.   -- back in 2006.

6   Q.   Was there anything that's been changed

7   about the network configuration that's recommended

8   by Lawson in connection with the current version of

9   Requistion Self-Service?

10   A.   I don't know of any off my head. But I

11   don't have knowledge of that.

12   Q.   So if a client used a network

13   configuration other than one of the two shown on

14   this page, what would be the result?

15   A.   I'm not sure I follow the question.

16   Q.   Would the application work properly if

17   the client chose a network configuration other than

18   one of the two shown on this page in the

19   installation guide?

20   A.   That's going to depend on whether the

21   client got the applications working or not. I

22   mean...

159

1   Lawson system via batch process.

2   Q.   To whom are these file layouts

3   distributed?

4   A.   I would assume they're made available to

5   clients of the particular suites.

6   Q.   Do you know if this is the most recent

7   version of the requisitions file layouts?

8   A.   I don't know.

9   Q.   Do you see up at the top of the first

10   page there is the words "Release 9.0.1"?

11   A.   Yes.

12   Q.   Do you know whether that -- Does that

13   assist you in determining whether these are the

14   most current versions of the requisitions file

15   layouts?

16   A.   No.

17   Q.   Can you turn to the second page of

18   Exhibit 11. The first sentence on that page reads:

19   "Use the descriptions in this file for converting

20   and interfacing data into Lawson."

21   In what circumstances would you need to

22   convert and interface the data into Lawson?

158

1   MS. ALBERT: Let me have the reporter

2   mark as Dooner Exhibit 11 a copy of a document

3   entitled "Requisitions File Layouts," and it bears

4   production number L0060405.

5   (Exhibit 11 marked for identification and

6   attached hereto.)

7   BY MS. ALBERT:

8   Q.   Can you identify the document that's

9   been marked as Dooner Exhibit 11?

10   A.   The title is "Requisitions File

11   Layouts."

12   Q.   What are these file layouts used for?

13   A.   I'll peek through the document here.

14   (Witness peruses document.)

15   I'm sorry. Could you repeat the

16   question?

17   Q.   What are these file layouts used for?

18   A.   I would say they're a reference to

19   enable you to use the listed programs.

20   Q.   Well, in what circumstances would

21   somebody use these file layouts?

22   A.   If they want to interface data into the

160

1   A.   You may be using non-Lawson software to

2   do parts of your business and want to interface

3   that data back into Lawson.

4   Q.   Under Item No. 6 on that page, the next

5   sentence reads: "The create header file feature is

6   designed to help you create CSV files to import

7   into Lawson."

8   Does this create header file feature

9   come with the Requisitions application as

10   delivered?

11   A.   No.

12   Q.   How does the client go about getting

13   access to the create header file feature that's

14   referenced there?

15   A.   I believe that is a part of Microsoft

16   Excel.

17   Q.   And the first bullet underneath that

18   sentence reads: "The headers at the top of the new

19   worksheet are in plain text to help you populate

20   your CSV. You must remove the headers before using

21   import DB."

22   Do you know what the term "import DB,"

161

1   do you know what that's a reference to?
2   A.   Uh-huh. Yes.
3   Q.   What is that?
4   A.   It's a Lawson utility.
5   Q.   What's that used for?
6   A.   Importing CSV data into a Lawson
7   database.
8   Q.   And does that utility come with the
9   Requisitions application as delivered?
10   A.   No.
11   Q.   Does it come with any application as
12 delivered?
13   A.   It's part of the environment layer.
14   Q.   What do you mean by "the environment
15 layer"?
16   A.   The layer that the applications run on.
17   Q.   Do they come with Lawson System
18 Foundation?
19   A.   I believe so. I'd say that's been
20 around for 20 years or so.
21   Q.   Can you turn to page 5 of the exhibit.
22 Do you see in the middle of the page there is a

163

1   A.   I'm not sure I follow your question.
2   Q.   Why does Lawson provide this information
3   to its clients that's used to format non-Lawson
4   data for importing into Lawson applications?
5   A.   I mean, the program doesn't -- the
6   program only sees it as bits and bytes of numbers
7   and letters. It doesn't know what field you're
8   dealing with, so we need to tell it the first
9   position is this type, the second through fifth is
10 this type. Whatever you provide in those fields
11 we're going to interpret it as that, that it's that
12 information. There is no -- The computer can't
13 think on its own, so you have to tell it what to
14 expect.
15   Q.   What happens if the client imports data
16 and it's not in this format?
17   A.   Garbage in, garbage out.
18   Q.   Could you turn to page 16 of the
19 exhibit. At the bottom of that page under the
20 heading "Output File Record Layout," the next line
21 refers to record type H, file header detail.
22   What's a record type H?

162

1   heading labeled, "Record Type 1 Headers"?
2   A.   Uh-huh.
3   Q.   And underneath that the sentence reads:
4   "Requisition interface RQ500 record type 1 headers
5   maps to the requisition header file." And then
6   below that there are tables with position, field
7   name, field type and length and description.
8   Do you see that?
9   A.   Yes.
10   Q.   So Lawson provides its clients with the
11 formats for importing pre-existing data into the
12 Lawson Requisitions application, and this is -- and
13 it tells them specifically how to format the data
14 using this type of documentation; is that correct?
15   A.   Yes.
16   Q.   So the Lawson application expects that
17 certain type of data will be found in certain
18 positions in the CSV file; is that correct?
19   A.   Yes.
20   Q.   Why is it necessary to tell the client
21 how to format non-Lawson data for importing into
22 Lawson applications?

164

1   A.   It normally stands for header.
2   Q.   What is a header type record used for?
3   A.   It's the -- contains general information
4   about the -- It depends which file we're talking
5   about here, but it owns the detail information that
6   resides underneath it.
7   Q.   So in connection with requisitions, what
8   type of information is in the requisition header?
9   A.   The requester. Default information that
10 may be used for that requisition, for the
11 individual lines in that requisition. A
12 requisition number to identify that requisition.
13   Q.   At the requester's location?
14   A.   Yes, I believe it is as well.
15   Q.   Can you turn to page 20 of the exhibit.
16 Do you see the heading on that page entitled
17 "Record Type L, File Lines"?
18   A.   Yes.
19   Q.   What is a record type L?
20   A.   I believe that refers to line.
21   Q.   So what is record type L used for in
22 connection with requisition?

165

1   A.   Well, in the process of importing data,

2   it identifies individual requisition lines.

3   Q.   So this would relate to the items that

4   the requester is seeking to order?

5   A.   Correct.

6   MS. ALBERT: Let me ask the reporter to

7   mark as Dooner Exhibit 12 a document entitled

8   "Purchase Order File Layouts," and it bears

9   production number L0043347.

10   (Exhibit 12 marked for identification and

11   attached hereto.)

12   BY MS. ALBERT:

13   Q.   Can you identify the document that's

14   been marked as Dooner Exhibit 12?

15   A.   It is the purchase order file layouts.

16   Q.   And what's the purpose of the purchase

17   order file layouts?

18   A.   Again, identifying the file formatting

19   to use the particular -- or identify interface

20   programs.

21   Q.   Does Lawson also provide these file

22   layouts to its clients?

167

1   A.   They could run the -- They could run it

2   without EDI, but you're not going to get anywhere

3   without it.

4   MS. ALBERT: I've been informed by the

5   videographer that we need to take a short break to

6   change the tape.

7   THE VIDEOGRAPHER: This marks the end of

8   Volume 1, Tape No. 2, in the deposition of Todd

9   Dooner. Going off the record. The time is

10   2:19 p.m.

11   (A recess was then taken.)

12   THE VIDEOGRAPHER: Back on the record.

13   Here marks the beginning of Volume 1, Tape No. 3,

14   in the deposition of Todd Dooner. The time is

15   2:26 p.m.

16   BY MS. ALBERT:

17   Q.   Mr. Dooner, can you turn to page 13 in

18   Exhibit 12. And the heading on that page is

19   "Transmitted PO Acknowledgment PO122"?

20   A.   Yeah.

21   Q.   Does PO122 come with the purchase order

22   application as delivered?

166

1   A.   Yes.

2   Q.   Are these file layouts also used for

3   converting and interfacing data into Lawson?

4   A.   Can you repeat that?

5   Q.   Are these file layouts also used for

6   converting and interfacing data into Lawson?

7   A.   They don't convert the data, but they

8   interface into Lawson, yes.

9   Q.   They're used to load data into Lawson?

10   A.   Correct, import it.

11   Q.   Can you turn to page 4 of the exhibit.

12   And this page and the next few pages following it

13   relate to mass PO, issue PO120.

14   A.   Uh-huh.

15   Q.   What is the purpose of PO120?

16   A.   I believe it's to issue POs, release

17   them or issue them is a term that Lawson uses. I'm

18   reading the text. Send EDI output files to a

19   vendor, or create an EDI output file.

20   Q.   Would a Lawson licensee need to have a

21   license to Lawson's EDI application in order to use

22   this file layout?

168

1   A.   Yes.

2   Q.   What information is included in a PO

3   acknowledgment record?

4   A.   I don't know off the top of my head.

5   Q.   Do you need to have licensed Lawson's

6   EDI software or have some other EDI application in

7   order to make use of the transmitted PO

8   acknowledgment functionality?

9   A.   I believe you do, yes.

10   Q.   Do you know whether the PO

11   acknowledgment record can include information as to

12   whether or not the vendor can satisfy a requested

13   delivery date for an item included on a purchase

14   order?

15   A.   I don't know off the top of my head.

16   Q.   Can you turn to page 34 in the exhibit.

17   And this page and the pages following it are the

18   file format, file layouts for the vendor price

19   agreement, PO536; is that correct?

20   A.   Yes.

21   Q.   And this is the file layout that's used

22   to load vendor item data into the item master; is

169

1   that correct?

2   A.   Yes. It's used to log vendor

3   agreements, and you can subsequently create -- user

4   load vendor items and item master file information

5   possibly. Well, start over.

6   It's used to load vendor price

7   agreements into Lawson.

8   Q.   And then you indicated that you can

9   subsequently create --

10   A.   Well, I'm just reading the text here.

11   You can add the vendor items to the item master

12   file and pricing information to the vendor

13   agreement file.

14   Q.   Okay. So once you load the vendor price

15   agreement data using PO536, what would be the next

16   step that you would need to do in order to import

17   that item information into the item master?

18   A.   I believe that's all part of the same

19   process.

20   Q.   So PO536 has an additional step once

21   you've loaded the vendor price agreement to take

22   that data and then create item master records?

170

1   A.   I believe there are options when setting

2   up the job PO536 to determine whether you have

3   already manually keyed in that information into

4   data master or you would want PO536 to generate

5   those for you at the time you're loading the

6   agreements.

7   Q.   So why would you load the agreement

8   using PO536 if you had already manually keyed in

9   the information into the item master?

10   A.   Because you're loading vendor price

11   agreements at that point and not item master

12   information.

13   Q.   So what additional information would you

14   need to load using PO536 if you had already loaded

15   the particular items associated with that agreement

16   into the item master?

17   A.   Can you repeat that?

18   Q.   What additional information would you

19   need to load using PO536 if you had already

20   manually keyed data relating to the particular

21   items associated with that vendor agreement into

22   the item master?

171

1   A.   Nothing.

2   Q.   So I don't understand your answer as far

3   as you have the option to manually key the data or

4   let the program automatically put it in there for

5   you?

6   A.   Into the item master table. If you want

7   to determine your own item numbers, have already

8   predefined those, these are things we're going to

9   buy, and then down the road you reach an agreement

10   with a vendor that you may purchase those, at that

11   point you would already have the item master

12   records. There would be no need to create them at

13   that point. You would just be loading the vendor

14   agreement.

15   Q.   So what additional information would you

16   need to load in with the vendor agreement with

17   respect to those items that were already part of

18   the item master?

19   A.   I'm not following your question.

20   Q.   Why would you need to -- Okay. Using

21   your scenario that you've already established the

22   item records and the item master that are

172

1   associated with a particular vendor agreement --

2   A.   No, they're not associated with a vendor

3   agreement. You haven't loaded it. This is loading

4   a new vendor agreement.

5   Q.   I don't understand the circumstance when

6   you -- Can you describe a circumstance for me in

7   which you would have already created item records

8   in the item database associated with a particular

9   vendor and then subsequent to that load the vendor

10   agreement using PO536?

11   A.   The same scenario I stated earlier, that

12   you've been purchasing these items from multiple

13   vendors for years now, pencils, pens. You have

14   item master record for them. Now you have

15   negotiated an agreement with Staples, OfficeMax.

16   You can now import that agreement into Lawson and

17   create a vendor agreement. It's a different table

18   than the item master.

19   Q.   And wouldn't the pricing associated with

20   that negotiated vendor agreement need to be somehow

21   associated with those prior item master records?

22   A.   Yes. And that's done by the item number

173

1   specified in the import data was going to have to

2   match the item master information that you already

3   have.

4   Q.   So you do need to import some of the

5   information relating to the item records at the

6   same time that you load the vendor price agreement,

7   that at a minimum need to import the new price

8   information for the items that are associated with

9   that vendor price agreement into the item master

10   database, correct?

11   A.   No.

12   Q.   I'm really not following your scenario

13   of having pre-established the items and then later

14   negotiating a contract with the vendor.

15   Wouldn't you have to load the new

16   contract price information into the item master?

17   A.   No.

18   Q.   So how will you -- When you're searching

19   for items, how do you retrieve the price

20   information that's specific to items that are

21   covered under a vendor price agreement?

22   A.   It's looked up on the vendor price

175

1   database into the Lawson item master database, what

2   API or utility or program is used for that process?

3   A.   There are a number of ways they can do

4   that. They can hand key the information. They

5   could run I believe it's IC11. It's apart from a

6   CSV.

7   MS. ALBERT: Let me have the reporter

8   mark as Dooner Exhibit 13 a document entitled

9   "Lawson Supply Chain Management Conversion Guide."

10   It bears production numbers LE02511014 through 175.

11   (Exhibit 13 marked for identification and

12   attached hereto.)

13   BY MS. ALBERT:

14   Q.   Are you familiar with the document

15   that's been marked as Dooner Exhibit 13?

16   A.   (Witness peruses document.)

17   I don't recall ever seeing this thing.

18   Q.   Do you know in what circumstances you

19   would use a conversion guide?

20   A.   Let me just read a little bit of this.

21   It appears to be for converting from a

22   non-Lawson system to Lawson.

174

1   agreement.

2   Q.   Is the information in the vendor price

3   agreement database indexed with the other

4   information that you use for conducting keyword

5   searches?

6   A.   No.

7   Q.   So if you conduct a keyword search for a

8   particular item and you retrieve the item master

9   record relating to items that match the keyword

10   that you searched on, how do you retrieve the valid

11   price information associated with that item if it's

12   under a vendor price agreement?

13   A.   There's business logic that would

14   determine costing based on existing agreements.

15   You may have more than one agreement.

16   Q.   Is there a particular program that has

17   this business logic that determines the costing of

18   the items?

19   A.   No. It's a common library. I don't

20   know the name of it.

21   Q.   If a Lawson system user just wanted to

22   load or import data from a legacy item master

176

1   Q.   Do you know if this conversion guide is

2   provided to Lawson clients?

3   A.   I would imagine, yes.

4   Q.   Can you tell based on the data on the

5   first page whether this is the most recent version

6   of the guide?

7   A.   No, I cannot.

8   Q.   Turn to page -- the page ending with the

9   Bates number 1046. And it says on this page that

10   "This chapter provides guidelines for converting

11   inventory control data from a non-Lawson system to

12   the Lawson Inventory Control application."

13   Do you see that?

14   A.   Yes.

15   Q.   And then can you turn to the next page.

16   It indicates at the top of the page that you can

17   convert different types of data, one being item

18   master records.

19   Do you see that?

20   A.   Yes.

21   Q.   And then below that, does Lawson provide

22   instructions on how to convert non-Lawson item

177

1 master information into the format required for the

2 Lawson item master?

3   A.   Could you repeat the question? I'm

4 sorry. I was reading.

5   Q.   Yeah. Underneath the data types that

6 can be converted there is a heading relating to

7 item master records.

8   A.   Yes.

9   Q.   And below that, does Lawson provide

10 instructions on how to convert non-Lawson item

11 master information into the format required for

12 loading into the Lawson item master?

13   A.   No.

14   Q.   What information is provided in the

15 section following that heading "Item Master

16 Records"?

17   A.   It looks like it's the minimum data

18 required to populate the individual records.

19   Q.   So Lawson says that "Minimum Lawson

20 fields that must be filled with the non-Lawson data

21 include item group, item description, and stock

22 unit of measure."

178

1   Why are those fields required to be

2 filled with data?

3   A.   This is required information by the

4 Lawson Item Master application.

5   Q.   Why does Lawson's application require

6 that minimum amount of information?

7   A.   It was determined to be the necessary

8 information to maintain an item master record.

9   Q.   Can you turn to the page with the Bates

10 number ending 55. And there is a heading on that

11 page that reads "Identify Inventory Control

12 Conversion Files and Work Files."

13   And with respect to item master records,

14 it provides a conversion file name, FF item mast or

15 IC811 FIT?

16   A.   Yeah.

17   Q.   What's the difference between those two

18 conversion file names?

19   A.   What's different?

20   Q.   What's the distinction between those

21 two?

22   A.   One is for UNIX and Windows and the

179

1 other is for System i.

2   Q.   What's System i?

3   A.   It's an IBM product.

4   Q.   And do those come with the software as

5 delivered?

6   A.   Do what come with the software?

7   Q.   Those files.

8   A.   No.

9   Q.   How are those files used? Can you

10 explain?

11   A.   Those are the files -- The client needs

12 to create files with those names for the associated

13 program to pick them up.

14   Q.   Oh, okay.

15   So the Lawson system is going to look

16 for data that's associated with either of those two

17 file names?

18   A.   It's going to look for a file with that

19 name when the job is run.

20   Q.   So Lawson is just providing its clients

21 with instructions that you need to name the working

22 file by either of those two names depending on

180

1 which system environment you're using?

2   A.   Correct.

3   Q.   Can you turn to the page with the Bates

4 number ending 57.

5   MR. SCHULTZ: These two are the 1055 and

6 1057, because there are several --

7   MS. ALBERT: Oh, 1057. It's actually

8 page 44 of the guide.

9   THE WITNESS: Yes.

10 BY MS. ALBERT:

11   Q.   The title on the page is "Load Inventory

12 Control Conversion Data." And the second paragraph

13 reads: "The suggested Lawson core technology

14 utility for loading CSV files is import DB."

15   Is that the same utility that we

16 referred to earlier as being supplied in connection

17 with the Lawson System Foundation?

18   A.   Yes.

19   Q.   And how does that utility work as far as

20 loading CSV files of inventory control data?

21   A.   I'm not so sure what you mean by "how

22 does it work."

181

1   Q.   What functions does it perform?

2   A.   It will read a CSV file and attempt to

3 load it into the designated Lawson database table.

4   Q.   And where does Lawson specify the file

5 layout format for the proper format for data that

6 you would load from a non-Lawson system into a

7 Lawson item master database?

8   A.   I don't know that we do. I mean, it

9 would exist in the database definition for the

10 particular file that you want to load.

11   Q.   Is there a database definition for the

12 item master?

13   A.   Yes.

14   Q.   Where is that found?

15   A.   It's part of the environment layer.

16 There's a DB def utility that's provided.

17   Q.   So I should look for a database

18 definition. Would it include in the words

19 something like item mast or something like that?

20   A.   Yeah. You would have to be familiar

21 with the 4GL tool to use it, I guess. But it would

22 allow you to select any of the files or the

182

1 application that you've purchased to view their

2 definition.

3   Q.   Can you turn to page 140 of the guide,

4 and that is on the page with the production number

5 ending 1153.

6   A.   Yep.

7   Q.   And it says on this page: "The

8 following table lists some examples of non-Lawson

9 data and the related conversion database file or

10 conversion work file."

11   And in the table there is a reference to

12 item master records, and then the Lawson conversion

13 database file or conversion work file is referred

14 to as FF Item WK or IC811 FIT.

15   How are those conversion database files

16 or conversion work files used?

17   A.   The same as we discussed prior, I

18 believe. I think they're just giving an example in

19 the appendix here.

20   Q.   So the client needs to name its working

21 file for the item master records by either of those

22 two names, depending on its environment, and then

183

1 the Lawson conversion application is looking for

2 something named either of those two names?

3   A.   That's my understanding from the pages

4 we've reviewed.

5   Q.   Can you turn to page 143 of the guide,

6 and that's found on the page with the Bates number

7 ending 1156.

8   A.   Yep.

9   Q.   The first bullet on that page reads:

10 "See Lawson conversion file layouts, export file

11 descriptions, data file text, database definitions,

12 and work file definitions for detailed information

13 on each field in a conversion file such as field

14 order, type and size. You can find the conversion

15 file layouts in the documentation center at

16 support.lawson.com. For information on how to

17 build export files and generate data file text and

18 database definitions, see the system utilities

19 reference guide."

20   So are those database definitions that

21 we referred to earlier, would those be found in

22 that system utilities reference guide?

184

1   A.   I have not seen them there. But from

2 reading what is stated here, it appears that they

3 have published those, yes.

4   Q.   So in addition to if I wanted to look

5 through the Lawson System Foundation code for the

6 database definition for the item master, I might be

7 able to find it in that system utilities reference

8 guide?

9   A.   Correct.

10   MS. ALBERT: Let me have the reporter

11 mark as Dooner Exhibit 14 a document entitled

12 "System Utilities Reference Guide." It bears

13 production numbers LE00394180 through 308.

14   (Exhibit 14 marked for identification and

15 attached hereto.)

16 BY MS. ALBERT:

17   Q.   Do you know if the document that's been

18 marked as Dooner Exhibit 14 is the systems

19 utilities reference guide that was just mentioned

20 in the prior exhibit?

21   A.   Yes, I believe it's the same.

22   Q.   What is the purpose of this guide?

185

1   A.   A reference guide for clients.

2   Q.   And how is it used, for what purpose?

3   A.   To describe the available utilities and

4   their purpose.

5   Q.   So are these utilities included with the

6   Lawson applications as delivered?

7   A.   They're part of the system foundation

8   level of Lawson, yeah. They're included in the

9   software bundle.

10   Q.   And do you see on the cover page of this

11   guide there is a reference to System i?

12   A.   Yes.

13   Q.   What does that refer to?

14   A.   That is the IBM series of machines.

15   Q.   So would there be a corresponding

16   systems utilities reference guide for UNIX-based

17   systems as well?

18   A.   I would believe so, yes.

19   Q.   Can you turn to page 26 of this guide,

20   and that's found on the page with the production

21   number ending 205. At the bottom of the page there

22   is a reference to a utility entitled "DB copy."

186

1   Do you see that?

2   A.   Yes.

3   Q.   And it says that the DB copy command is

4   used to copy data from one data area to another

5   data area.

6   Can you describe in what circumstances

7   this utility would be used?

8   A.   Again, it's up to client discretion, but

9   the scenario would be having a test system and

10   another copy of the system. Maybe you're planning

11   on upgrading to the latest version and you want to

12   have the same data across both of them to see if

13   the end results of processing match.

14   Q.   Could it be used to copy item master

15   data from a non-Lawson system to a Lawson item

16   master?

17   A.   No.

18   Q.   Can you turn to page 31 of the guide

19   that's on the page with the production number

20   ending 210.

21   A.   Yeah.

22   Q.   Do you see on that page there is a

187

1   utility referred to as DB load?

2   A.   Yes.

3   Q.   And it says that that utility is used to

4   load a database from a flat file.

5   Can you describe in what circumstance

6   this utility would be used?

7   A.   If you read a little farther, it has to

8   go in conjunction with the DB dump. So again, to

9   me it performs a similar function as DB copy with a

10   couple of options to allow you to, you know, choose

11   different functionality.

12   But again, to dump the data from one

13   Lawson table to the same Lawson table in a

14   different product line or data area.

15   Q.   It has to be formatted as a flat file?

16   A.   It has to be -- The output has to be

17   from the DB dump command, which I know there is

18   another utility in this manual.

19   Q.   Can you turn to page 36 of the guide on

20   the page with the Bates number ending with 215.

21   A.   Yeah.

22   Q.   Do you see the utility referred to as DB

188

1   update on that page?

2   A.   Yes.

3   Q.   It says: "The DB update command

4   retrieves data records from the source data area

5   file using the saved primary key in the log file,

6   then converts, inserts or updates records in a

7   destination data area file to match the source data

8   area file."

9   A.   Uh-huh.

10   Q.   In what types of situations would this

11   DB update utility be used?

12   A.   I don't know specifics, but again it

13   looks like it's just to sync up data between two

14   data areas.

15   Q.   What do you mean by sync up?

16   A.   Be sure that the data in one Lawson data

17   area is the same as another Lawson data area.

18   Q.   Can you turn to page 62 of the guide on

19   the page with the Bates number ending 241.

20   A.   62?

21   Q.   Right.

22   A.   Yeah.

189

1   Q.   And there is a utility referenced on

2   this page, imp/exp?

3   A.   Uh-huh.

4   Q.   And it says to the right of that, import

5   and export file.

6   In what situations would this utility be

7   used?

8   A.   Let me read this a little bit just to...

9   (Witness peruses document.)

10   Basically, it allows you to import data

11   into the Lawson database table.

12   Q.   Could this utility be used in connection

13   with importing legacy item master data into the

14   Lawson item master database?

15   A.   I believe -- Sure, if you formatted the

16   file properly.

17   Q.   Can you turn to the next page of the

18   guide, page 63. And towards the bottom of that

19   page there is a reference to a utility import DB.

20   A.   Yeah.

21   Q.   And it says it's used to import

22   comma-delimited files?

190

1   A.   Correct.

2   Q.   Do you know if this utility can be used

3   to load legacy item master data into the Lawson

4   item master database?

5   A.   I believe it was mentioned in the prior

6   document to this. A possible solution.

7   Q.   So in what circumstances would you use

8   the import DB utility as opposed to the imp/exp

9   utility?

10   A.   You pick your flavor of import file, I

11   guess. One is a CSV, one is a carriage return.

12   You know, it's different file formats.

13   MS. ALBERT: All right. Let me have the

14   reporter mark as Dooner Exhibit 15 a document

15   bearing production numbers ePlus 0941453 through

16   2028.

17   (Exhibit 15 marked for identification and

18   attached hereto.)

19   BY MS. ALBERT:

20   Q.   I'll just represent for the record that

21   this document, Dooner Exhibit 15, was produced to

22   ePlus on the S3 demonstration system laptop that

191

1   was produced to us by Lawson, and it was referred

2   to as -- I believe it's called the S3 help texts.

3   A.   Yes.

4   Q.   Are you familiar with the S3 help texts?

5   A.   Not in printed format. But I believe

6   they're viewable from each of the different

7   transaction screens.

8   Q.   So are these S3 help texts provided to

9   Lawson clients?

10   A.   If it's the help texts associated with

11   each form, yes, they're part of the applications.

12   Q.   What do you mean by "associated with

13   each form"?

14   A.   Well, I guess I don't know where this

15   was derived from exactly.

16   Q.   It was just produced to us on a

17   demonstration system. I don't know how it

18   occurs -- I'm trying to find out from you how a

19   client would be provided with access to these help

20   texts.

21   A.   I believe there is a help key or

22   function within each of the forms that produce its

192

1   associated help texts.

2   Q.   Can you turn to the page with the Bates

3   number ending with 1584. It's about a fourth of

4   the way through the document. The title on the

5   page is "Availability by Location."

6   A.   Yeah.

7   Q.   And the first two sentences on that page

8   read: "Use availability by location IC40.1 to

9   inquire on item availability by location. This

10   form displays available stock on hand, demand,

11   supply, and in-transit quantities."

12   Do you know from where the availability

13   by location program derives the in-transit quantity

14   information?

15   A.   Those are IC transactions.

16   Q.   And what data is retrieved to produce

17   in-transit quantity information?

18   A.   I'm not sure I understand your question.

19   Q.   Well, when you said that the in-transit

20   quantity information was an IC transaction, what

21   did you mean by that?

22   A.   Well, there's transactions where you can

193

1   transfer inventory from one location to another.

2   That's what I'm interpreting that as. That would

3   be an open transaction until the item arrived at

4   the other location.

5   Q.   So can this be used to determine that a

6   particular quantity that you had ordered from a

7   supplier was in transit from the supplier to your

8   location?

9   A.   No, I don't believe that that's what

10 that is referring to.

11   Q.   What do you believe it refers to?

12   A.   Well, I'm interpreting it as an IC

13 in-transit transfer transaction. I may be wrong.

14   Q.   I mean, what functionality is associated

15 with an IC in-transit transaction?

16   A.   What is the functionality associated

17 with it? Transferring stock on hand from one

18 location to another.

19   Q.   So would that be used for an internal

20 transfer of stock within a company?

21   A.   Yes. That's my interpretation here. I

22 guess I would have to look at IC40, the source

194

1   code, to see where that bucket is being filled.

2   Demand is open orders. But that's

3   different than in transit. My interpretation may

4   be wrong. I would have to look at the source code.

5   Q.   Can you turn to the page with the Bates

6   number ending with 600. The title on the page is

7   "Item Search."

8   A.   Yeah.

9   Q.   And the first sentence on that page

10 reads: "Use item search IC30.1 to search for item

11 numbers defined in IC11.1 item master or IC10.2

12 item master and location."

13   What's the difference between IC11.1 and

14 IC10.2?

15   A.   I believe we discussed this earlier.

16 It's 10.2 or -- IC10 is a hybrid of IC11 and IC12.

17 It combines item master and item location

18 maintenance.

19   Q.   So IC10 includes the information in IC11

20 but it includes additional location information

21 too?

22   A.   It allows you to view item master and

195

1   item location information.

2   Q.   Can you turn to the page with the Bates

3   number ending 633. The title on the page is "Item

4   Master Listing."

5   A.   Yeah.

6   Q.   The last sentence on that page reads:

7   "This report includes most, but not all, inventory

8   master file record information."

9   Do you see that?

10   A.   Yeah.

11   Q.   What information is not included when

12 you run the item master listing IC210?

13   A.   I would have no idea off the top of my

14 head.

15   Q.   Can you turn to the page with the Bates

16 number ending 641.

17   A.   Uh-huh.

18   Q.   The title on that page is "Associated

19 Items." Are you there?

20   A.   Yes.

21   Q.   It says you can use associated items

22 IC13.1 to maintain a list of substitute item

196

1   numbers for an item.

2   And the third sentence indicates that

3   four applications use substitute items, one of

4   which is Requisitions.

5   How does the Requisitions application

6   make use of the associated items or substitute

7   items for an item?

8   A.   I don't know in detail. I believe it's

9   just an informational message that one exists. If

10 you wanted to order the substitute, you would have

11 to search for that substitute item and start the

12 process over. There's no automatic replacements or

13 anything.

14   Q.   So in the Requisitions application, if

15 you conducted a search of the item master for a

16 particular item, when would you receive a display

17 message that there was a substitute item associated

18 with that item?

19   A.   I don't know off the top of my head.

20   Q.   And this page indicates that you can use

21 this IC13.1 program to define associated items,

22 including either substitute or complementary items.

197

1   How do you -- How would you physically

2   go about defining substitute or complementary items

3   that are associated with particular items in the

4   item master?

5   A.   Where are you reading from? I'm sorry.

6   Q.   Under "Defining Associated Items."

7   A.   Okay. And I'm sorry, could you repeat

8   your question?

9   Q.   This page indicates that you can use the

10   IC13.1 program to define associated items,

11   including either substitute or complementary items.

12   How would you go about defining

13   substitute or complementary items that are

14   associated with particular items in the item

15   master?

16   A.   I guess all those steps here. You would

17   have to access the IC13 screen. I'm not

18   100 percent familiar with the screen without seeing

19   it in front of me, but you're basically associating

20   one item master record item to another and

21   designating it as a possible substitute.

22   Q.   Is there some sort of a table, a

198

1   database table, in which item master items are

2   associated with substitute or complementary items?

3   A.   Yeah. I believe there is an additional

4   table created via this process.

5   Q.   Do you know what table that's called?

6   A.   I don't know. I would be guessing.

7   Q.   Would it be something like associated

8   item table?

9   A.   I believe it's item sub, something to

10   that nature.

11   Q.   But if I looked at this source code for

12   IC13.1, would that tell me what table?

13   A.   Yes.

14   Q.   And does this IC13.1 program come with

15   the inventory control software as delivered?

16   A.   Yes.

17   Q.   Can you turn to the page with the Bates

18   number ending 676. The title on the page is "Item

19   Master."

20   A.   Uh-huh.

21   Q.   And I think we've talked about this item

22   master IC11.1 program today.

199

1   A.   Yes.

2   Q.   It says in the first sentence on that

3   page: "Use item master IC11.1 to add

4   nonlocation-specific item information, including

5   the location of an image file to view for web-based

6   ordering applications."

7   How do you get that image file into the

8   item master record? Do you know the process that's

9   used?

10   A.   Yes.

11   Q.   Can you describe that for me?

12   A.   Well, you're not -- you're basically --

13   you're providing a location of the image. The

14   image itself is not stored anywhere in the item

15   master. It could be a web page. It could be a

16   shared folder on your network that you store images

17   of products at and you would just -- There is a

18   place within the IC11 form to include a file path

19   or a URL to that information or to that image.

20   Q.   And then when you conduct a search of

21   the item master database and retrieve item records

22   that match the search query, when you go to view

200

1   the item detail, how does it pull up the image

2   associated with that item master record?

3   A.   It uses that URL or file path to load

4   the image on a web page.

5   Q.   Can you turn to the page with the Bates

6   number ending 680 that's entitled "Item

7   Attributes."

8   A.   Yeah.

9   Q.   What is the Item Attributes (IC56.1)

10   program used for?

11   A.   I don't know off the top of my head. I

12   would have to look at that screen.

13   Q.   Can you define additional attributes for

14   an item master record beyond those established

15   using IC11.1?

16   A.   I don't have an idea at this point what

17   information.

18   Q.   Can you look on the next page titled

19   "Keyword Search Load."

20   A.   Uh-huh.

21   Q.   I think we talked about this earlier.

22   A.   Yeah.

201

1   Q.   Is this the program that's used to build

2   the search index based upon the keyword origin

3   fields that you've enabled for keyword searching?

4   A.   Yes.

5   Q.   And it says under "Processing Effect" --

6   Does it read: "All of the records in the itemmast

7   poitemven, Item UPN1, Item UPN2, Item UPC, Item SKU

8   and ic usrfl def tables to build the index"?

9   A.   I don't know for a fact, but I'm

10   assuming that the text here is correct.

11   Q.   Can you turn to the page with the Bates

12   number ending 687.

13   A.   Yeah.

14   Q.   The title on that page is "Load UNSPSC

15   Product Codes." And the text says: "Run load

16   UNSPSC product codes IC516 to import a CSV file of

17   codes that can be attached to the item master

18   records to create an item hierarchy."

19   And I think we talked about this

20   earlier. This program comes with the application

21   as delivered; is that correct?

22   A.   Yes.

202

1   Q.   And then these codes are also used to

2   create the categories in the categories search

3   task; is that correct?

4   A.   I mean, this is referring to loading --

5   defining the UNSPSC codes through IC516.

6   Q.   And then once you do that, you use

7   another program to associate those UNSPSC codes

8   with each item in the item master?

9   A.   Correct.

10   Q.   And then what do you use to associate

11   those UNSPSC codes with the categories that are

12   listed if you select category search task?

13   A.   I don't believe there is any other setup

14   required at that point. The categories task within

15   RSS, you are browsing through UNSPSC segments to

16   view the item master records that are attached to

17   them.

18   Q.   Can you turn to the page with the Bates

19   number ending 721. The title on this page is "HL7

20   Item Master DeRoyal."

21   Do you know to what this program refers,

22   what functionality?

203

1   A.   Not really.

2   Q.   Is this a special program that was

3   created by Lawson for a specific client?

4   A.   I don't think it was for a particular

5   client, no.

6   Q.   Was it created for health industry

7   clients?

8   A.   I would assume so.

9   Q.   Do you know what DeRoyal refers to?

10   A.   Just by reading it, it looks like it's a

11   surgery system.

12   Q.   Can you turn to the page with the Bates

13   number ending 728. The title on the page is "Item

14   Master Load."

15   A.   Yes.

16   Q.   And it refers to this item master load

17   IC811 program that we've referenced today that can

18   be used to import item master data from another

19   perhaps non-Lawson item master into Lawson item

20   master.

21   Do you use this program in conjunction

22   with the import DB system utility that we saw in

204

1   the system utilities reference guide?

2   A.   I would not -- they would not be used in

3   conjunction -- Well, for item master, you're going

4   to use one or the other. I mean, you may load

5   another file with import DB. But if you're going

6   to run IC811, you wouldn't run the DB import then.

7   Q.   And the item master load IC811 program

8   comes with the Inventory Control application as

9   delivered?

10   A.   Yes.

11   Q.   Can you turn to the page with the Bates

12   number ending 759. The title on that page is

13   "Purchase Order Inquiry." And towards the bottom

14   of the page there is a reference to a backorder

15   field.

16   Do you see that?

17   A.   Cancel backorders?

18   Q.   And then the cancel backorder field.

19   That's a yes?

20   A.   Yes.

21   Q.   How are back orders tracked in the

22   Lawson Procurement applications?

205

1   A.   I believe there's some inquiry screens

2   to show the status of the order, whether it's on

3   back order or not. I don't know the specific

4   program.

5   Q.   So once a user issues a purchase order,

6   they might be able to receive some sort of

7   communication in response from the vendor that

8   would perhaps notify them if a particular item was

9   on back order?

10   A.   I believe this comes into play when --

11   at receipt time, if I remember correctly. So if I

12   order 100 and I received 75, and we had set the PO

13   to cancel back order, the 25 would just be -- we

14   cancel the remaining. Or it would be canceled at

15   the time the order is placed, I believe. I believe

16   that's sent as information to the vendor.

17   If you read No. 4, "Add line detail,

18   bought items received."

19   Q.   So in conjunction with the receiving

20   process, you could keep track of something if it

21   was on back order?

22   A.   Well, I'm not sure you would keep track

206

1   of it, but you could cancel anything that was on

2   back order.

3   Q.   Well, could you keep a back order

4   notification in the system if you wanted to wait

5   for those items that were on back order?

6   A.   You just would not cancel it.

7   Q.   How does the system give you a

8   notification that something that you ordered is on

9   back order?

10   A.   I don't know off the top of my head.

11   Q.   Who would you ask if you wanted to find

12   out that information?

13   A.   Jill Richardson.

14   Q.   Can you turn to the page with the Bates

15   number ending 765.

16   A.   Yep.

17   Q.   The title on that page is "Vendor Item

18   Inquiry." And it indicates that you can use vendor

19   item inquiry PO72.1 to view all the vendor item

20   records entered in PO13 vendor item.

21   From what screen can you access vendor

22   item inquiry?

207

1   A.   PO72.

2   Q.   Does the Requistion Self-Service search

3   user interface allow you to access this

4   information?

5   A.   The PO72? No. It's a stand-alone

6   program.

7   Q.   Can you turn to the page with the Bates

8   number ending 810.

9   A.   810.

10   Q.   The title on that page is "Transmitted

11   PO Acknowledgment." It indicates that you can run

12   transmitted PO acknowledgment PO122 to update

13   purchase order acknowledgment sent by vendors via

14   electronic data interchange.

15   So in order to use this functionality,

16   would the Lawson system user have to have either

17   the Lawson EDI application or another EDI

18   application?

19   A.   Yes.

20   Q.   And using this program, it indicates

21   that if there is an error in processing a purchase

22   order or differences between the purchase order and

208

1   the acknowledgment, there will be message lines

2   under the purchase order identifying the error or

3   difference.

4   And one example of an error or

5   difference that the program will find is an

6   indication of whether the item is on back order; is

7   that correct?

8   A.   Yeah.

9   Q.   Can you turn to the page with the Bates

10   number ending 924. The title on that page is

11   "Vendor Item."

12   A.   Yes.

13   Q.   This page indicates that you can use

14   vendor item PO13.1 to maintain a cross-reference

15   list of vendors for an item.

16   And in what circumstances would you

17   access this PO13.1 information?

18   A.   Strictly for maintenance.

19   Q.   If you conducted a search for an item

20   that you wanted to requisition and you wanted to

21   find additional vendors that carried the same or a

22   similar item, could you access this cross-reference

209

1   list of vendors?

2   A.   Not from requisitions, no.

3   Q.   From what program can you access this

4   cross-reference list of vendors for an item?

5   A.   PO13.

6   Q.   In what circumstances would a user

7   utilize PO13.1?

8   A.   Your day-to-day user wouldn't probably

9   even have access to this. I mean, it would be --

10   It's more of a setup by a buyer or inventory

11   control-type person that maintains this type of

12   information.

13   Q.   So why would you want to have a

14   cross-reference list of alternative vendors for a

15   particular item? How would you practically make

16   use of that information?

17   A.   This is used to maintain a list of item

18   master records and their associated vendor and

19   vendor item information. You may have to go in

20   there because you no longer buy from Staples. You

21   delete that record or inactivate it. It's more of

22   a -- it's a maintenance role. It's not a process

211

1   Q.   What information is included in the PO

2   interface file?

3   A.   I don't know all the specifics. The

4   necessary information to generate a PO.

5   Q.   So this is the program that would be run

6   when a user submits a requisition, the requisition

7   is approved, and then you want to generate one or

8   more purchase orders from that requisition?

9   A.   Yeah. I mean, ideally this is something

10   that that user wouldn't run. It would be set up by

11   an administrator to run hourly, once a day, once a

12   night, you know, up to their discretion but...

13   Q.   It says underneath -- beside the heading

14   "Release Purchase Orders," it says: "Select yes in

15   this field to have the application automatically

16   release purchase orders that are created by the

17   program."

18   So you can set this up to do this

19   automatically; is that correct?

20   A.   Yes.

21   MS. ALBERT: Let me have the reporter

22   mark as Dooner Exhibit 16 a document entitled

210

1   used in ordering. It's a setup screen.

2   Q.   Can you turn to the page with the Bates

3   number ending 956. The title on this page is

4   "Purchase Order Interface from Lawson

5   Applications."

6   A.   Yes.

7   Q.   And the text indicates that "You can run

8   purchase order interface from Lawson applications

9   PO100 to update the purchase order application with

10   ordering information from the inventory control

11   requisition and order entry applications."

12   It further indicates that "This program

13   creates purchase orders from the purchase order

14   interface file."

15   How does this program create a purchase

16   order from information from the Requisition

17   application?

18   A.   The information is gathered from the PO

19   interface file.

20   Q.   What information is transmitted to the

21   PO interface file?

22   A.   At what point?

212

1   "Requisitions Self-Service 8.1, 9.0." It bears

2   production numbers L0 -- LE02932685 through 765.

3   (Exhibit 16 marked for identification and

4   attached hereto.)

5   BY MS. ALBERT:

6   Q.   Are you familiar with the document

7   that's been marked as Dooner Exhibit 16?

8   A.   I don't recall it specifically, but it

9   appears to be from a CUE presentation.

10   Q.   And does this have on the document both

11   the screens that were shown to the attendees as

12   well as perhaps the text that the presenter gave

13   that was associated with each screen?

14   MR. SCHULTZ: Objection; foundation.

15   THE WITNESS: I don't know.

16   BY MS. ALBERT:

17   Q.   And you indicated before that CUE

18   presentations are provided to Lawson clients?

19   A.   Yes.

20   Q.   Can you turn to the page with the Bates

21   number ending 687. And in the first paragraph, the

22   third sentence reads: "You can search the catalog

213

1   which will search for items in your item master or
2   vendor items."
3   What's the difference between searching
4   for items in the item master versus searching for
5   vendor items?
6   A.   Can you repeat the question?
7   Q.   What's the difference between searching
8   for items in the item master or searching for
9   vendor items?
10   A.   They're two different tables.
11   Q.   Does the search load program load data
12 associated with both tables into the search index?
13   A.   I'm not sure I follow your question.
14   Q.   Are both of those two tables indexed for
15 searching?
16   A.   Some of the fields, yes. I believe we
17 looked at that in another document.
18   Q.   What fields in the vendor item table are
19 indexed for searching?
20   A.   I believe it's vendor item number and
21 vendor item description.
22   Q.   Can you turn to the page with the Bates

215

1   Q.   So you can restrict them to a subset of
2   all available punchout catalogs?
3   A.   Not catalogs. What -- the vendor.
4   Q.   So if I have a Staples punchout site, an
5   Office Depot punchout site and an OfficeMax
6   punchout site, you could specify that user No. 1
7   only had access to Staples and not access to the
8   other two?
9   A.   I believe so, yes.
10   Q.   Can you turn to the page with the Bates
11 number ending 699. This page relates to UNSPSC
12 product codes.
13   A.   Uh-huh.
14   Q.   The first sentence in the last paragraph
15 states that "UNSPSC codes can be added in IC16 or
16 it can also be loaded using IC516."
17   What's the difference between IC16 and
18 IC516?
19   A.   IC16 is an online transaction. IC516 is
20 a batch process. They're synonomous with each
21 other, though. The end result is populating the
22 UNSPSC data.

214

1   number ending 693. In the second paragraph it
2   indicates that "To utilize punchout you must set up
3   some supporting technology and additional
4   e-Procurement records. Such records include the
5   user records and e-Procurement templates. These
6   records allow Procurement Punchout to allow users
7   to punch out to specific vendors."
8   So can you set up the system so that
9   particular requesters are either granted or denied
10 access to particular punchout catalogs associated
11 with specific vendors?
12   A.   You kind of combined a few things there.
13   Q.   Can you --
14   A.   Rephrase that.
15   Q.   If you have a system that includes, say,
16 three punchout catalogs associated with three
17 different vendors, can you set -- can you specify
18 that particular users are only allowed to access a
19 subset of that group of punchout catalogs that's
20 available on your system?
21   A.   I believe you can designate which
22 vendors they have punchout capabilities to.

216

1   Q.   Could you turn to the page with the
2   Bates number ending 703. The last sentence on that
3   page states: "Checkout saves items to database,
4   empties card and releases requisition."
5   Do you see that?
6   A.   Yes.
7   Q.   What happens to the data once the
8   requisition is released?
9   A.   I think we went through this exact
10 scenario earlier. But it depends on whether you
11 have approvals or not. It may go into an approval
12 process. It depends on the type of items that you
13 are ordering on that requisition. If the
14 requisition is --
15   Q.   If the requisition is approved, does it
16 then get processed by that PO interface program
17 that we referred to earlier?
18   A.   That is a possibility, yes.
19   Q.   Can you turn to the page with the Bates
20 number ending 713. And this page relates to
21 creating a requisition by searching the catalog.
22   In the middle of the paragraph I'm

217

1 referring to the sentence that begins: "Keywords

2 exist because you enable certain fields as

3 searchable in IC00.5 and run IC800 to build

4 keywords from these fields. These fields come from

5 fields in the files itemmast, which is IC11;

6 itemloc, which is IC12, and/or poven item PO13."

7   So are fields from all three of those

8 tables, itemmast, item location and PO vendor item,

9 are fields in all three of those tables included

10 when you build the search index for keyword

11 searching?

12   A.   It's going to depend on what you've

13 designated as searchable.

14   Q.   So assuming that you designate all

15 possible origin fields to be searchable, then would

16 fields from all three of those database tables be

17 indexed for keyword searching?

18   A.   Not all fields from all tables, but yes.

19   Q.   Fields from all three?

20   A.   Fields included in all three, yes.

21   Q.   And would I need to look in IC800 to

22 determine which fields from each of those three

218

1 database tables are included in the search index?

2   A.   That would be a good starting point,

3 yes.

4   THE WITNESS: Do you mind if we take a

5 short break?

6   MS. ALBERT: Sure.

7   THE VIDEOGRAPHER: This marks the end of

8 Volume 1, Tape No. 3, in the deposition of Todd

9 Dooner. We are going off the record. The time is

10 3:50 p.m.

11   (A recess was then taken.)

12   THE VIDEOGRAPHER: Back on the record.

13 Here marks the beginning of Volume 1, Tape No. 4,

14 in the deposition of Todd Dooner. The time is

15 4:05 p.m.

16   MS. ALBERT: Let me have the reporter

17 mark as Dooner Exhibit 17 a document entitled

18 "Lawson Procurement Punchout Installation Guide."

19 It bears production numbers L0234779 through 810.

20   (Exhibit 17 marked for identification and

21 attached hereto.)

22   THE WITNESS: (Witness peruses

219

1 document.)

2 BY MS. ALBERT:

3   Q.   Can you identify what Exhibit 17 is?

4   A.   It is the Lawson Procurement Punchout

5 installation guide, Version 9.0.0.x.

6   Q.   Do you know if this is the most current

7 version of this particular guide?

8   A.   I don't know.

9   Q.   What is the purpose for this guide?

10   A.   To aid a client in the installation of

11 Procurement Punchout application.

12   Q.   We saw earlier the installation guide

13 for Requistion Self-Service and now we're seeing

14 this guide. Does Lawson provide an installation

15 guide with each Lawson application that is

16 licensed?

17   A.   I don't know if there is an individual

18 guide for each application, but there may be a

19 guide that encompasses all the 4GL applications.

20   Q.   Does Lawson have any sort of role in the

21 installation process for its clients?

22   A.   No.

220

1   Q.   Would Lawson assist a client in

2 installation of an application?

3   A.   The client can hire professional

4 services if they choose.

5   Q.   They can hire Lawson Professional

6 Services if they choose?

7   A.   That's one option, yes.

8   Q.   Can you turn to page 9 of the guide.

9 That's on the page with the Bates number ending

10 787.

11   A.   Uh-huh.

12   Q.   Under the heading "Vendor Templates," it

13 indicates that "A vendor template is the record in

14 the ED system code for a vendor website available

15 for punchout."

16   What is the ED system code?

17   A.   It's just another set of 4GL programs

18 for defining data dealing with punchout in this

19 case.

20   Q.   So are there certain vendor templates

21 already included in the system code for particular

22 vendor websites available for punchout?

221

1   A.   No.

2   Q.   So what do they mean by a vendor

3   template?

4   A.   You're setting up vendor information for

5   the punchout process.

6   Q.   So is the template the form that you

7   would use and populate with specific information

8   about particular vendors that you want to punch out

9   to?

10   A.   I don't know what information it

11   involves without seeing the screen. But you are

12   providing some vendor information, yes.

13   Q.   Can you turn to the page with the Bates

14   number ending with 790.

15   A.   Yes.

16   Q.   And on this page the title reads "Lawson

17   Procurement Punchout Network Architecture Example."

18   And then there are certain process steps, I guess

19   if you will, labeled 1 through 8.

20   No. 1 -- Well, do these different steps

21   indicate the process flow for when you use Lawson

22   Procurement Punchout?

223

1   That's an outside standard that we adhere to and

2   vendors would adhere to as well.

3   Q.   Step 4 is: "A URL to punchout is

4   embedded in punchout setup response and is used to

5   redirect the user to the vendor website."

6   Step 5 is: "A new shopping window opens

7   connected to vendor site. User selects items and

8   checks out."

9   Step 6 is: "Vendor sends shopping cart

10   content in punchout order request document to

11   punchout servlet where it is temporarily cached,

12   shopping session ends, window closes."

13   How does the vendor know how to format

14   the punchout order request and direct the content

15   back to Lawson?

16   A.   Again, we are utilizing the cXML

17   standard communication there.

18   Q.   Is there a specific information that

19   Lawson requires be sent back with the punchout

20   order request from the vendor back to Lawson?

21   A.   I believe there are. I'm not sure if

22   it's a Lawson requirement or -- Well, it's a Lawson

222

1   A.   It appears to outline the flow, yes.

2   Q.   So the first step is that "The user

3   clicks on a punchout vendor icon in RSS."

4   The second step is that "The RSS sends

5   punchout setup request to vendor for authorization

6   via remote punchout servlet."

7   Does that remote punchout servlet come

8   with the punchout application as delivered?

9   A.   With Procurement Punchout, yes.

10   Q.   And then Step 3 is that "The vendor

11   responds with punchout setup response sent back to

12   Lawson RSS."

13   How does the vendor know how to format

14   the punchout setup response that's sent back to

15   Lawson?

16   A.   I'm not 100 percent sure on that.

17   Q.   Does Lawson provide specifications that

18   can be sent to a vendor to tell them how to

19   properly format the punchout setup response?

20   A.   I believe it's part of the cXML

21   standard. That's a standard step in that ordering

22   process. I don't believe Lawson provides that.

224

1   and cXML requirement.

2   Q.   What information is required to be sent

3   back with the punchout order request back to the

4   Lawson system?

5   A.   I don't know all the fields.

6   Q.   Do you know some of the fields?

7   A.   Item description. Cost quantity. UOM.

8   Q.   And then the seventh step in the process

9   is: "Detecting the end of the shopping session.

10   RSS submits a request to the punchout servlet to

11   retrieve the cached shopping cart content."

12   Step 8 is: "RSS creates a Lawson

13   requisition from this retrieved content."

14   So the Lawson system used the data

15   that's included in the punchout order request to

16   create a Lawson requisition; is that correct?

17   A.   Correct.

18   Q.   Could you turn to the page with the

19   Bates number ending 793. On this page there are

20   certain components that are available for download.

21   Does Lawson make each of these

22   components available for download to its clients?

225

1   A.   If they have purchased punchout, yes.

2   Q.   What is the functionality of the Lawson

3   Procurement Punchout bookmarks?

4   A.   Which one are you looking -- Okay.

5   Those are links in the Lawson portal

6   that would point to those ED systems or ED programs

7   that was referenced earlier. A shortcut.

8   Q.   What does ED programs do?

9   A.   I'll -- If you refer back to your first

10   question, they set up vendor information to enable

11   the punchout process.

12   Q.   And what's the functionality associated

13   with the Lawson procurement punchout dispatcher?

14   A.   You know, I don't recall offhand the

15   details of that.

16   Q.   Where could I find out the details of

17   that?

18   A.   I believe there's maybe mention in this

19   document. I don't know. There is probably a

20   manual describing that further. I'm not sure. Or

21   I would have to reference a coworker.

22   Q.   Would it be found on -- starting at the

226

1   page with the Bates number ending 808?

2   A.   808. I guess this tells you how to set

3   it up.

4   Q.   Does it tell you any information from

5   which you can determine the functionality of the

6   procurement -- the Lawson Procurement Punchout

7   dispatcher?

8   A.   It does not that I can see. I don't --

9   My understanding is that's not part of the punchout

10   process. That's an additional feature. But I

11   would have to do research on that.

12   Q.   Where would you go to do that research?

13   A.   Probably back to a coworker.

14   Q.   Is there a particular coworker that you

15   would ask?

16   A.   I would talk to Dwight deLancey.

17   Q.   Earlier today I asked you about certain

18   people that you talked to in order to prepare for

19   your deposition.

20   A.   Uh-huh.

21   Q.   And you mentioned the three Lawson

22   attorneys, Mr. Schultz, Mr. Graham and Ms. Hughey.

227

1   A.   Yeah.

2   Q.   And you also mentioned that you had

3   talked to Dale Christopherson at Lawson.

4   A.   Correct.

5   Q.   Is there something about your prior

6   answer that you want to modify or add to?

7   A.   Yeah. I was just -- I stated those were

8   formal meetings that I had with those folks. I

9   mean, during my day-to-day activities I have talked

10   to numerous other Lawson employees, Dwight deLancey

11   included, Brent Honadel, Jill Richardson, and along

12   with reviewing some of the material that was listed

13   on the 30(b)(6) document as far as the reference

14   manuals and some of the programs mentioned at that

15   point.

16   Q.   What is Mr. deLancey's position?

17   A.   He's a software engineer, as I am.

18   Q.   Does he have responsibility for any

19   particular applications?

20   A.   He is responsible for the punchout

21   portion.

22   Q.   And then Ms. Richardson, what is her

228

1   position?

2   A.   I believe her title is a business

3   analyst or supply chain. Necessary supply chain.

4   Q.   I understand from Mr. Christopherson's

5   deposition that you were involved in a review of

6   the ePlus patents that are at issue in this

7   litigation. Is that correct?

8   A.   I was in a meeting discussing the

9   initial suit that came up.

10   Q.   When did that meeting occur?

11   A.   I don't remember an exact date. I

12   believe it was when we first found out about the

13   litigation, I think it was July. I'm not sure on

14   that date.

15   Q.   Who was involved in that meeting?

16   A.   I believe myself, Dale, I think Dwight

17   and Jill were also involved.

18   Q.   And by "Dale," you're referring to Dale

19   Christopherson?

20   A.   Yes, Christopherson. Yes.

21   Q.   And by "Dwight," you're referring to

22   Dwight deLancey?

229

1   A.   Correct.

2   Q.   And then Jill Richardson?

3   A.   Correct.

4   Q.   Did you review the ePlus patents in

5   the course of that meeting?

6   A.   I did not personally read the patents at

7   that time, no.

8   Q.   Have you reviewed the ePlus patents at

9   any time?

10   A.   I have not read them in full. I have

11   paged through them and looked at certain portions

12   of them.

13   Q.   Which patents did you review?

14   A.   I don't recall.

15   Q.   Do you know if you reviewed all three of

16   the ePlus patents that are in suit?

17   A.   I paged through them, yes, definitely.

18   Q.   Did someone ask you to review these?

19   A.   Not that I recall.

20   Q.   Are you familiar with the structure of

21   the patents?

22   A.   I'm not sure I understand the question.

230

1   Q.   Well, let me go ahead and mark as Dooner

2   Exhibit 18 a copy of U.S. Patent 6,023,683.

3   (Exhibit 18 marked for identification and

4   attached hereto.)

5   BY MS. ALBERT:

6   Q.   So are you familiar with the different

7   parts of a patent, the title, the abstract?

8   A.   No, I am not.

9   Q.   Specifications, the figures, the claims?

10   A.   Not in detail, no.

11   Q.   And you said earlier today that you're

12   not a named inventor on any patents, correct?

13   A.   Correct.

14   Q.   When you reviewed the ePlus patents,

15   did you understand the subject matter of the

16   patents?

17   A.   From a very broad nature.

18   Q.   Which portions of the ePlus patents

19   did you review?

20   A.   I paged through them all.

21   Q.   Did you read through the entire patents?

22   A.   I don't recall reading word for word. I

231

1   tried to understand the concepts conveyed at the

2   time, I remember.

3   Q.   How much time did you spend in total

4   reviewing the ePlus patents?

5   A.   Oh, I don't know. Four hours or so.

6   Q.   Did you review the ePlus patents on

7   multiple occasions?

8   A.   Yeah.

9   Q.   On how many occasions did you review

10   them?

11   A.   I don't recall offhand.

12   Q.   Did you discuss the ePlus patents with

13   any persons at Lawson?

14   A.   Yeah. I mean --

15   Q.   With whom did you discuss the ePlus

16   patents?

17   A.   Coworkers.

18   Q.   Which coworkers?

19   A.   Jill Richardson, Brent Honadel, Dwight

20   deLancey, probably several others as well.

21   Q.   You mentioned a Bret Honadel?

22   A.   Brent.

232

1   Q.   Brent Honadel?

2   A.   Honadel, yes.

3   Q.   What's his position?

4   A.   He does -- works with EDI.

5   Q.   What was the substance of your

6   discussion of the patent with Mr. Christopherson?

7   A.   There was not a direct conversation with

8   Mr. Christopherson. It was more of -- It was the

9   first meeting that I remember going over, reviewing

10   them and trying to understand what the litigation

11   was about.

12   Q.   What was the general nature of your

13   discussion with Mr. Christopherson?

14   A.   Trying to understand what is in here,

15   what we currently do in our products, that type of

16   thing. The way certain things work today.

17   Q.   What was the nature of your discussion

18   of the ePlus patents with Ms. Richardson?

19   A.   Similar in nature.

20   Q.   Is Ms. Richardson a technical person?

21   A.   She's a business analyst. She writes

22   design documents and that type of thing. She's not

233

1   a coder, though.

2   Q.   What was the nature of your discussion

3   concerning the ePlus patents with Mr. deLancey?

4   A.   It resolved around the punchout process.

5   Q.   And did you think that the punchout

6   process was relevant to the ePlus patents?

7   A.   It's just a piece of our requisition

8   ordering process, direct appeal process. I don't

9   remember specifically why it came up.

10   Q.   What was the nature of your discussion

11   of the ePlus patents with Mr. Honadel?

12   A.   It involved something to do with EDI at

13   the time. Transmitting orders. I don't remember

14   specifics again.

15   Q.   And why did you think that EDI was

16   relevant to the ePlus patents?

17   A.   Again, it's a part of our requisition

18   appeal process. It can be a part of it.

19   Q.   Did you look at the section of the

20   ePlus patents that's referred to as the claims?

21   A.   That rings a bell, yes.

22   Q.   For example, if you look on Exhibit 18,

234

1   starting at Column 24.

2   A.   Is there a particular page?

3   Q.   Column 24. If you look at the top,

4   after the figures section, there are column numbers

5   at the top.

6   A.   Yeah.

7   Q.   And if you go towards the back of the

8   document, do you see Column 24 and then towards the

9   bottom of the page there is some words: "We

10   claim:"?

11   A.   Yes.

12   Q.   And then following that there is a

13   number of numbered paragraphs, if you will, through

14   the end of the patent.

15   A.   Yeah.

16   Q.   Did you review that section of the

17   ePlus patents in your review?

18   A.   That was part of the overall review,

19   yes.

20   Q.   Were there particular claims that you

21   reviewed?

22   A.   Not that I recall. On my own, anyway.

235

1   Q.   Well, in connection with any of your

2   discussions with these other Lawson employees, did

3   you discuss specific claims within the ePlus

4   patents?

5   A.   No.

6   Q.   Were you asked to look for any prior

7   systems that might be relevant to the ePlus

8   patents?

9   A.   I'm not sure. Rephrase that.

10   Q.   Have you ever heard of the term "prior

11   art"?

12   A.   Yeah.

13   Q.   What's your understanding of the meaning

14   of that term?

15   A.   Something that has -- that we had done

16   in the past.

17   Q.   Something that Lawson has done in the

18   past?

19   A.   Lawson, correct.

20   Q.   Were you asked to look for any prior art

21   Lawson systems that might be relevant to the

22   ePlus patents?

236

1   A.   I was asked to review some source code.

2   Q.   What source code were you asked to

3   review?

4   A.   Some 5.0 source code, release 5.0.

5   Q.   And were there particular modules or

6   applications within release 5.0 that you were asked

7   to review?

8   A.   Yeah. If I remember correctly,

9   inventory control, requisitions and purchase order.

10   Q.   Did release 5.0 have a Requisition

11   Self-Service application associated with that

12   release?

13   A.   There was no Requistion Self-Service.

14   It had requisitions.

15   Q.   Did release 5.0 have any Procurement

16   Punchout functionality associated with that

17   release?

18   A.   No, I don't believe so.

19   Q.   Were you asked by anyone whether

20   Lawson's procurement systems practiced any of the

21   claims of the ePlus patents?

22   A.   Not directly. I don't recall that.

237

1   Q.   Did you make any analysis to determine

2   whether Lawson's procurement systems satisfied any

3   of those claims that were at the back of the

4   ePlus patents?

5   A.   I was asked to review source code to

6   help them understand what its functionality was at

7   the time.

8   Q.   And were you asked to review any of the

9   current source code to help the Lawson personnel

10 understand what the current functionality of the

11 Lawson procurement systems is?

12   A.   Sure, yes.

13   Q.   And what Lawson source code were you

14 asked to review relevant to the current

15 functionality of the Lawson procurement systems?

16   A.   I have reviewed some IC, inventory

17 control requisition.

18   Q.   Did you review the Requistion

19 Self-Service source code?

20   A.   Not directly. I work with that on

21 almost a daily basis, so I didn't really review the

22 source code itself but some of the processes I may

238

1   have looked at again.

2   Q.   Were you asked to review the code

3   relating to the Procurement Punchout application?

4   A.   Not directly, no. Not look at the code.

5   Q.   Did you make any determinations relative

6   to whether Lawson's current procurement systems

7   satisfied the claims in the ePlus patents?

8   A.   I did not make any determination, no.

9   Q.   Were there particular ones of the claims

10 in the ePlus patents that you reviewed?

11   A.   I did not -- I did not relate them

12 directly to the claims.

13   Q.   Can you look at Claim 3 of the '683

14 patent? And that starts on Column 25.

15   A.   Claim 3?

16   Q.   Right.

17   A.   Yeah.

18   Q.   If you look down to the fourth paragraph

19 in that claim, that paragraph reads: "means for

20 building a requisition using data relating to

21 selected matching items and their associated

22 source(s)."

239

1   A.   Uh-huh.

2   Q.   You would agree, wouldn't you, that

3   Lawson's Requisition application has the ability to

4   build requisitions for desired items?

5   A.   Yes.

6   Q.   And Lawson's Requisition application has

7   the ability to conduct searches for items that

8   match a search query and use that data in order to

9   build a requisition, correct?

10   MR. SCHULTZ: Objection; compound.

11   THE WITNESS: Could you repeat that?

12 I'm sorry. Rephrase it.

13 BY MS. ALBERT:

14   Q.   Lawson's Requisition application has the

15 ability to conduct searches for items that match a

16 search query; isn't that correct?

17   A.   Yes.

18   MR. SCHULTZ: Objection; vague.

19 BY MS. ALBERT:

20   Q.   And can the Lawson Requisition

21 application use the data resulting from a search

22 query to build a requisition?

240

1   MR. SCHULTZ: Objection; vague.

2   THE WITNESS: Yes.

3   BY MS. ALBERT:

4   Q.   And if you'll look -- I'm sorry -- at

5   the next paragraph below that paragraph in Claim 3,

6   that paragraph reads: "means for processing the

7   requisition to generate one or more purchase orders

8   for the selected matching items."

9   You would agree, wouldn't you, that the

10 Lawson purchase order application has the ability

11 to process a requisition and generate one or more

12 purchase orders, wouldn't you?

13   MR. SCHULTZ: Objection; compound and

14 vague.

15   THE WITNESS: We can generate purchase

16 orders for multiple vendors from our requisition if

17 the requisition contains orders from multiple

18 vendors.

19 BY MS. ALBERT:

20   Q.   And can the item master database in the

21 Inventory Control application include data relating

22 to at least two product catalogs?

241

1   MR. SCHULTZ: Objection; vague.

2   THE WITNESS: No.

3   BY MS. ALBERT:

4   Q.   Can you load item data from at least two

5   vendor product catalogs into the item master

6   database?

7   MR. SCHULTZ: Same objection.

8   THE WITNESS: I'm not sure I follow all

9   your question.

10   BY MS. ALBERT:

11   Q.   Can you load vendor item data into the

12   item master database in the Inventory Control

13   application?

14   A.   No.

15   Q.   Can you use the -- I think it was the

16   IC800 program to load item data into the item

17   master database?

18   A.   No.

19   Q.   I can't remember the name of the program

20   now that we talked about that's used for loading

21   item data into the item master database.

22   You would agree, wouldn't you, that

242

1   there is a program that can be used to load item

2   data into the item master database in the Inventory

3   Control application, correct?

4   A.   Item data, correct. Yes.

5   Q.   And that item data that can be loaded

6   into the item master database can contain product

7   description relating to the items?

8   A.   Yes.

9   Q.   And that item data can contain cost or

10   price information?

11   A.   No.

12   Q.   Can the item data in the item master

13   database contain a manufacturer ID?

14   A.   I believe so.

15   Q.   Can the -- And you would agree that the

16   Lawson Requistion Self-Service application includes

17   a means for searching for matching items in the

18   item master database?

19   MR. SCHULTZ: Objection; vague.

20   THE WITNESS: Could you repeat that,

21   please?

22   BY MS. ALBERT:

243

1   Q.   You would agree, wouldn't you, that the

2   Lawson Requistion Self-Service application includes

3   a means for searching for matching items in the

4   item master database?

5   MR. SCHULTZ: Same objection.

6   THE WITNESS: You can search for a

7   specified keyword.

8   BY MS. ALBERT:

9   Q.   And you can use the -- that search to

10   retrieve item records from the item master

11   database, correct?

12   A.   Yes.

13   Q.   Were you involved in -- at all in

14   searching for documents responsive to ePlus's

15   document requests in this litigation?

16   A.   Could you repeat that again?

17   Q.   Were you involved at all in conducting

18   searches for documents responsive to ePlus's

19   document requests in this litigation?

20   A.   No.

21   Q.   Were you asked to search through your

22   documents or your computer files for documents to

244

1   produce in this litigation?

2   A.   No.

3   MS. ALBERT: I think that's all for this

4   portion of the deposition.

5   EXAMINATION

6   BY MR. SCHULTZ:

7   Q.   Mr. Dooner, just to clarify that last

8   response that you gave.

9   A.   Yeah.

10   Q.   Is it accurate that you did provide

11   documents to someone else at Lawson who produced

12   those?

13   A.   A clone was made of my entire hard drive

14   and numerous other people at Lawson's hard drives

15   were turned over.

16   EXAMINATION

17   BY MS. ALBERT:

18   Q.   Okay, can I just follow up on that

19   response?

20   Were you asked to produce your e-mail

21   files?

22   A.   Yes.

245

1   Q.   And did you produce those?

2   A.   I did not personally produce those.

3   They were gathered by somebody at Lawson. I do not

4   know.

5   Q.   And what types of files or documents

6   were found on your hard drive that was imaged?

7   A.   Everything and anything that was on the

8   laptop.

9   MS. ALBERT: Okay. Nothing further.

10   MR. SCHULTZ: Could we take a quick

11   break? I want to go through my notes.

12   THE VIDEOGRAPHER: We are going off the

13   record. The time is 4:40 p.m.

14   (A recess was then taken.)

15   THE VIDEOGRAPHER: We are back on the

16   record. The time is 4:49 p.m.

17   EXAMINATION

18   BY MR. SCHULTZ:

19   Q.   Mr. Dooner, I would like you to refer to

20   what has been marked as Exhibit 18. Do you have

21   that in front of you?

22   A.   Yes.

246

1   Q.   Please refer to the second-to-last page

2   and look at Column 25, please.

3   During the examination counsel for

4   ePlus asked you questions regarding Claim 3.

5   Do you recall those?

6   A.   Yes.

7   Q.   Did counsel ask you any questions

8   regarding the first full paragraph that states:

9   "at least two product catalogs containing data

10   relating to items associated with the respective

11   sources"?

12   A.   No.

13   Q.   Did counsel ask you anything regarding

14   the second paragraph, "means for selecting the

15   product catalogs to search"?

16   A.   No.

17   Q.   Did counsel ask you anything with

18   respect to the third paragraph, "means for

19   searching for matching items among the selected

20   product catalog" -- excuse me, "selected product

21   catalogs"?

22   A.   No.

247

1   Q.   The fourth paragraph, were there

2   questions asked regarding that?

3   A.   Yes.

4   Q.   And does the fourth paragraph refer back

5   to the elements of the first three paragraphs?

6   A.   It refers to selecting matching items,

7   so I would say yes.

8   Q.   On the fifth paragraph, you were asked

9   questions regarding that, correct?

10   A.   Yeah.

11   Q.   And the fifth paragraph refers back to

12   the first three paragraphs, correct?

13   A.   Yeah. It has to do with where you find

14   your matching items from.

15   Q.   You were asked questions regarding the

16   sixth paragraph?

17   A.   I don't recall that one, no.

18   Q.   Would you agree that the sixth paragraph

19   refers back to the first three paragraphs?

20   A.   Yeah. Yes.

21   MR. SCHULTZ: Thank you, Mr. Dooner. I

22   have nothing further.

248

1   MS. ALBERT: I have nothing further.

2   MR. SCHULTZ: Okay.

3   MS. ALBERT: That concludes the personal

4   deposition portion of Mr. Dooner's deposition.

5   THE VIDEOGRAPHER: Here marks the end of

6   Volume 1, Videotape No. 4 in the deposition of Todd

7   Dooner. We are going off the record. The time is

8   4:52 p.m.

9   (End of personal portion of the deposition.)

10   (Beginning of 30(b)(6) portion of the

11   deposition.)

12   (Exhibit 19 marked for identification and

13   attached hereto.)

14   THE VIDEOGRAPHER: Back on the record.

15   The time is 4:55 p.m.

16   EXAMINATION

17   BY MR. STEIN:

18   Q.   Good afternoon, Mr. Dooner. My name is

19   Andrew Stein and I represent ePlus in the matter

20   against Lawson Software, and I will be taking the

21   portion of your deposition that we lawyers commonly

22   refer to as a 30(b)(6) deposition.

249

1   So I assume that Jennifer has gone over

2   some ground rules with you earlier this morning in

3   your individual deposition, so I won't go over

4   those again here.

5   A.   Okay.

6   Q.   So I see the court reporter has put in

7   front of you a document that's been marked as

8   Exhibit No. 19.

9   A.   Yes.

10   Q.   I would like you to take a look at that

11   and let me know if you have seen that document

12   before.

13   A.   I have seen a similar document. I'm not

14   sure I have seen one dated March 2nd.

15   Q.   When did you see the document that you

16   think is similar to this one?

17   A.   It has probably been at least two weeks.

18   Q.   Two weeks. So is that before or after

19   February 22nd?

20   A.   I don't recall. I was scheduled to come

21   out here a week ago. I don't remember when I

22   received the deposition.

250

1   Q.   You think it was before -- But you think

2   it was before February 22nd that you saw something

3   like this?

4   A.   It was right around that date, yes.

5   Q.   Okay. Do you understand that you've

6   been designated by Lawson to testify on its behalf

7   with respect to certain topic areas?

8   A.   Yes.

9   Q.   And you understand that your testimony

10   as a designee of Lawson is being given on behalf of

11   the company just as if the company was sitting in

12   your chair?

13   A.   Yes.

14   Q.   Okay. Directing your attention to

15   page 9 of Exhibit 19, do you see at the top it says

16   "Topic Areas for 30(b)(6) Deposition of Lawson"?

17   A.   Yes.

18   Q.   And do you see underneath that it says

19   for Paragraph 1: "Structure, function, operation

20   of the Lawson S3 software including, without

21   limitation..."?

22   A.   Yes.

251

1   Q.   Do you see topic A written here on page

2   9 of Exhibit 19?

3   A.   Yes.

4   Q.   Do you understand that you have been

5   designated to testify on behalf of Lawson with

6   respect to subtopic A as it's written here?

7   A.   Yes.

8   Q.   And are you prepared to testify as to

9   all matters known or reasonably known to Lawson

10   with respect to subtopic A?

11   A.   I'm prepared to testify to the best of

12   my ability, yes.

13   Q.   With respect to subtopic B, is it your

14   understanding that you've also been designated to

15   testify as to subtopic B here on page 9 of Exhibit

16   19?

17   A.   Yes.

18   Q.   And are you prepared to testify as to

19   all matters known or reasonably known to Lawson

20   with respect to subtopic B?

21   A.   Yes.

22   Q.   With respect to subtopic C, is it your

252

1   understanding that you have been designated to

2   testify on behalf of Lawson?

3   A.   Yes.

4   Q.   And are you prepared to testify as to

5   all matters known or reasonably known to Lawson

6   with respect to subtopic C?

7   A.   Yes.

8   Q.   Would your answers to those two

9   questions be the same with respect to subtopic D?

10   A.   Yes.

11   Q.   And would your answer be the same with

12   respect to subtopic E?

13   A.   Yes.

14   Q.   And the same with respect to subtopic F?

15   A.   Yes.

16   Q.   The same with subtopic G?

17   A.   Yes.

18   Q.   The same with respect to subtopic H?

19   A.   Yes.

20   Q.   The same with respect to subtopic I?

21   A.   Yes.

22   Q.   The same with respect to subtopic J?

253

1   A.   Yes.

2   Q.   The same with respect to subtopic K?

3   A.   Yeah.

4   Q.   The same with respect to subtopic L?

5   A.   Yes.

6   Q.   The same with subtopic M?

7   A.   Yes.

8   Q.   The same with respect to subtopic N as

9   in Nancy?

10   A.   Yes.

11   Q.   The same with respect to subtopic O?

12   A.   Yes.

13   Q.   The same with respect to subtopic P?

14   A.   Yes.

15   Q.   The same with respect to subtopic Q?

16   A.   Yes.

17   Q.   The same with respect to subtopic R?

18   A.   Yes.

19   Q.   The same with respect to subtopic S?

20   A.   Yes.

21   Q.   The same with respect to subtopic T?

22   A.   Yes.

254

1   Q.   The same with respect to subtopic U?

2   A.   Yes.

3   Q.   The same with respect to subtopic V?

4   A.   Yes.

5   Q.   And the same with respect to subtopic W?

6   A.   Yes.

7   Q.   Do you currently have any programming

8   responsibilities for the Lawson S3 system?

9   A.   Yes.

10   Q.   Could you describe those

11   responsibilities for me?

12   A.   I am responsible for the Requistion

13   Self-Service application.

14   Q.   The entire application?

15   A.   Yes.

16   Q.   Do you have people that work under you

17   that also have coding responsibilities?

18   A.   I wouldn't say under me but alongside of

19   me, yes.

20   Q.   Okay. Would you consider yourself to be

21   the most knowledgeable person with respect to the

22   Requistion Self-Service source code?

255

1   A.   Yes.

2   Q.   With respect to topic 2 and the

3   subtopics listed underneath subtopic -- Let me

4   start over.

5   With respect to topic 2 and the

6   subtopics listed underneath topic 2, are you -- do

7   you understand that you've been designated to

8   testify on Lawson's behalf with respect to those

9   topics?

10   A.   Yes.

11   Q.   And are you prepared to testify as to

12   all matters known or reasonably known to Lawson

13   with respect to those topics and subtopics?

14   A.   Yes.

15   Q.   You can set that aside.

16   In order to prepare for the 30(b)(6)

17   portion of the deposition, could you describe for

18   me, without divulging any attorney-client

19   communications, could you explain to me what you

20   did to prepare?

21   A.   I reviewed -- Well, I met with counsel

22   on a couple of occasions, reviewed much of the

256

1   material that was listed in the 30(b)(6) and

2   refreshed my memory on some of it. Talked to

3   coworkers. Did some homework for approximately a

4   week or so just reviewing and refreshing.

5   Q.   Okay. You said you met with counsel.

6   How many times did you meet with counsel in person?

7   A.   In person, twice to prepare for the

8   deposition.

9   Q.   And how long did those meetings last?

10   A.   I believe the first one was four hours.

11   The second one, I believe, was roughly three hours.

12   Q.   And who was present at those meetings?

13   A.   The first meeting it was Rachel Hughey.

14   The second meeting it was also Rachel Hughey, Will

15   Schultz and Josh Graham.

16   Q.   Besides the individuals that you just

17   named as being present in person at either of those

18   two meetings, was anybody present on the phone?

19   A.   No.

20   Q.   Was anybody present in a video

21   conference capacity?

22   A.   No.

257

1   Q.   Was anybody present at those meetings in

2   any other fashion besides video conference,

3   telephone or in person?

4   A.   No.

5   Q.   Did you review any documents at the

6   first meeting in person?

7   A.   Yes.

8   Q.   What documents did you review?

9   A.   I believe it was the -- Dale

10   Christopherson's transcript.

11   Q.   Did you review any particular portion of

12   the Christopherson transcript?

13   A.   Various pages. I don't recall exactly.

14   I took them home to review further later.

15   Q.   When you went home to review them

16   further, were there any portions of the transcript

17   that you were looking for to read in particular?

18   A.   No. I read it from start to -- or start

19   to end. Sorry.

20   Q.   Besides the Christopherson deposition

21   transcript, were there any other documents that you

22   reviewed during those meetings?

258

1   A.   Many of the manuals that we have gone

2   over prior and that are listed on the 30(b)(6).

3   Q.   Did you review any portion of the source

4   code during those in-person meetings?

5   A.   No. Well, we did look at some -- Yes,

6   there were some exhibits I believe that were

7   submitted under Dale Christopherson's testimony.

8   Rachel did show me some of those just to see if I

9   was familiar with those or had seen them before.

10   Q.   Okay. And were you familiar with those?

11   A.   Well, it may not be the exact document

12   but I was familiar with what was contained in them,

13   yeah.

14   Q.   Basically, you were familiar with the

15   source code in the document but not that form of

16   the source code?

17   A.   Correct.

18   Q.   Besides the two in-person meetings, did

19   you have any phone calls with your counsel to

20   prepare for your deposition?

21   A.   No.

22   Q.   Did you have any in-person meetings with

259

1   your colleagues at Lawson during your time

2   preparing for the deposition?

3   A.   No informal meetings, but casual

4   conversations, yes.

5   Q.   Can you recall the topics of those

6   casual conversations you had with Lawson employees

7   with respect to preparing for your deposition?

8   A.   I spoke with Jill Richardson in regards

9   to PO536. I spoke with Dwight deLancey regarding

10   punchout. And I talked to Brent Honadel regarding

11   EDI.

12   Q.   Could you spell Brent's last name?

13   A.   H-o-n-a-d-e-l, I believe. Honadel.

14   Q.   And you spoke to him regarding what

15   again?

16   A.   EDI.

17   Q.   And does EDI stand for electronic data

18   interchange?

19   A.   I believe so.

20   Q.   Your conversation with Jill Richardson

21   concerning PO536, what was the reason you spoke to

22   her about that?

260

1   A.   Just to further understand the program

2   itself.

3   Q.   What's your understanding of what PO536

4   is?

5   A.   It's used to load vendor agreement --

6   vendor agreements into the Lawson database.

7   Q.   And does Jill -- I'm sorry.

8   A.   And to possibly create item master

9   records based off that data contained in the

10   agreements.

11   Q.   When you say "load vendor agreements

12   into the Lawson database," what is a vendor

13   agreement?

14   A.   It's an agreement that you have

15   negotiated with a particular vendor designating

16   items that you may purchase from them and prices.

17   Q.   So does PO536 undertake the loading of

18   that information or is it the loading of the actual

19   agreement itself?

20   A.   It loads the data into the Lawson

21   database that is considered the vendor agreement.

22   Q.   Does Jill work down the hall from you or

261

1 did this --

2   A. Yeah. She's an aisle over.

3   Q. How long did this conversation last?

4   A. A half hour.

5   Q. Did you take any notes during your

6 conversation with Jill?

7   A. No.

8   Q. Did you show her any documents or did

9 she show you any documents during your

10 conversation?

11   A. I believe we brought up the PO536 screen

12 and looked at it.

13   Q. Are you familiar in Cobalt programming

14 with screens and program definitions?

15   A. Program definition, yeah.

16   Q. So did you pull up the PD with Jill?

17   A. No.

18   Q. Then you pulled up the screen, the

19 actual --

20   A. The actual application interface, yes.

21   Q. Okay. Did you speak to Jill about

22 anything else besides PO536?

262

1   A. No.

2   Q. Your conversation with Dwight deLancey

3 with respect to punchout, approximately when did

4 that take place?

5   A. It was last week sometime.

6   Q. And does Dwight also work down the hall

7 from you?

8   A. Yeah. One aisle over.

9   Q. And about how long did that conversation

10 last?

11   A. 15 minutes.

12   Q. And what was the substance of that

13 conversation with Dwight about punchout?

14   A. I don't recall the exact detail. It was

15 punchout in general.

16   Q. Is there a reason why you wanted to

17 speak to Dwight about punchout?

18   A. He is responsible for the punchout

19 product.

20   Q. Okay. But why did you -- Why did you

21 choose just to go talk to somebody else about --

22   A. I talk to him on a daily basis. I mean,

263

1 it just refreshed my memory to make sure I had

2 things straight in my head.

3   Q. Okay. Did you feel before the

4 conversation with Dwight that you were not the most

5 knowledgeable person at Lawson with respect to

6 punchout?

7   A. I may not be the most knowledgeable

8 person. I mean, Dwight maintains the source code

9 for the punchout remote servlet.

10   Q. And why did you go to Dwill -- Dwill --

11 Let me start over.

12   Why did you go to Jill about PO536?

13   A. I consider her a knowledgeable person on

14 the program.

15   Q. And does she have responsibilities that

16 are focused on the PO536 area?

17   A. No.

18   Q. Do you consider -- Let me start over.

19   Earlier I asked if there were people

20 that worked under you and you said not really under

21 but kind of with you.

22   A. Uh-huh.

264

1   Q. Do you consider Jill, Dwight and Brent

2 to be in that group of people that you referred to

3 earlier as working with you on the Requistion

4 Self-Service program?

5   A. They are not responsible for the source

6 code, no. They are coworkers in the procurement

7 suite of products.

8   Q. But they have no coding

9 responsibilities?

10   A. Jill does not. Dwight and Brent both

11 do.

12   Q. Okay. Was there a particular reason why

13 you decided to go talk to Brent about EDI in

14 particular?

15   A. Yes.

16   Q. And why was that?

17   A. I would consider him the EDI expert.

18   Q. What reason was there, if any, for you

19 wanting to talk to Brent about EDI?

20   A. I believe it had to do with the 832

21 transaction.

22   Q. And what's that?

265

1   A.   I believe it's a catalog import, whether

2   we did that or not.

3   Q.   Okay. And was he able to answer that

4   question for you?

5   A.   Yeah.

6   Q.   What did you ask him about whether the

7   software was able to do something or not?

8   A.   I asked him whether we accept EDI 832

9   transactions.

10   Q.   And does the Lawson software do that?

11   A.   No. Not to my understanding.

12   Q.   Besides these three people, were there

13   any other Lawson colleagues that you spoke to in

14   preparation for your deposition?

15   A.   Not that I can recall, no.

16   Q.   The conversation with Brent, about how

17   long did that last?

18   A.   Oh, 15, 20 minutes.

19   Q.   You mentioned also that you had done

20   some homework on your own to prepare for your

21   deposition.

22   A.   Uh-huh.

266

1   Q.   Could you describe that for me?

2   A.   As I stated earlier, basically reviewing

3   the list of items on the 30(b)(6), just refreshing

4   my memory looking at some of the documentation that

5   was specified there so I understood what it was.

6   Q.   And did you at any point during your

7   homework, did you take any notes --

8   A.   No.

9   Q.   -- about what you were seeing?

10   A.   No.

11   Q.   The documents that are listed under

12   subtopic 2, are there any documents that are listed

13   there under subtopic 2 of Exhibit 19 that you had

14   not been exposed to before?

15   A.   Yes.

16   Q.   And which ones were those?

17   A.   It was letter F.

18   Q.   And did you undertake to find that

19   document and review it before today?

20   A.   Yes.

21   Q.   So it's fair to say, then, that the

22   other documents listed under topic 2 besides the

267

1   one listed for subtopic F you have been exposed to

2   before?

3   A.   I had seen them. Didn't recognize them

4   by name. But yes.

5   Q.   Is there any one document here in this

6   list in particular that you've used more often than

7   others?

8   A.   I -- No. Maybe the IOS programming

9   interfaces. E.

10   Q.   E?

11   At Lawson, what is Lawson 4GL?

12   A.   That's a programming environment that we

13   use to build our OS applications.

14   Q.   Does the GL stand for anything, or does

15   the 4GL stand for anything?

16   A.   It's fourth generation language.

17   Q.   Now, is Lawson 4GL actually a language,

18   or is that more of an environment?

19   A.   I guess it's how you want to define

20   language. It's proprietary environment for

21   building applications.

22   Q.   Is it based on Cobalt?

268

1   A.   Yes.

2   Q.   Are there any functionalities that

3   Lawson 4GL has that Cobalt the language does not?

4   A.   I'm not sure I understand the question.

5   Q.   I'm trying to understand your

6   distinction between the Lawson 4GL environment and

7   a traditional programming language that is

8   available, let's say off the shelf.

9   A.   Sure.

10   Q.   So if there's any information that I can

11   provide to you to make that question better and

12   more understandable, let me know. But that's the

13   distinction that I'm trying to go for and trying to

14   understand.

15   So is there any other information I can

16   give you?

17   A.   Can you repeat your initial question?

18   Q.   Sure. What are the differences between

19   the Lawson 4GL environment and the basic

20   functionality available in the Cobalt programming

21   language?

22   A.   Well, we provide, again, an environment

269

1   or tools or utilities that are used within Cobalt

2   that allow you to access the relational database

3   without having to know SQL, that type of thing

4   basically.

5   Q.   Are you familiar -- I'm sorry.

6   A.   Go ahead.

7   Q.   Are you familiar with the concept of a

8   dynamic linked library?

9   A.   Vaguely.

10   Q.   Are you familiar with the concept of an

11   API, application programmers' interface?

12   A.   Yeah, sure.

13   Q.   Is fair to say, then, that 4GL, Lawson

14   4GL provides APIs or additional functionality that

15   can be provided to an end user that's not

16   necessarily provided by the Cobalt language?

17   A.   Yeah. They're provided to the

18   programmer versus an end user.

19   Q.   The tools or utilities that you

20   mentioned that are used with Cobalt that allow you

21   to access the database without having to know SQL,

22   that kind of thing --

270

1   A.   Sure.

2   Q.   -- are those tools and utilities written

3   in Cobalt or are they written in another language?

4   A.   I believe they're written in another

5   language.

6   Q.   Do you know what that language is?

7   A.   My guess at this point is C. Which

8   ultimately ends up generating SQL calls to the

9   database server.

10   Q.   Could you describe for me the overall

11   architecture of the S3 software in terms of -- Let

12   me rephrase.

13   Could you describe for me the overall

14   architecture of the S3 software with respect to the

15   Procurement applications?

16   And I'll ask you to in your answer talk

17   about how the front end is structured and the

18   language that's used for the front end and how the

19   back-end functions are structured and the languages

20   used in the back end, and how data is stored that's

21   accessed and how that data is stored, whether it's

22   Oracle, SQL or some other database concept.

271

1   So with that understanding, can you

2   answer the question?

3   MR. SCHULTZ: Let's break that down into

4   questions.

5   THE WITNESS: Right. You're going to

6   have to ask me individual questions.

7   BY MR. STEIN:

8   Q.   Okay. So let's take the front end. You

9   understand what -- what I am referring to when I

10   say the front end of the Lawson S3 procurement

11   applications?

12   A.   I'm not sure.

13   Q.   How about user facing, do you understand

14   what that means in the context of the procurement

15   applications?

16   A.   I know what it means to me. I'm not

17   sure what you're referring to, though.

18   Q.   What does it mean to you?

19   A.   It means the user interface, the screen

20   presented to the user.

21   Q.   Okay. So for the screens presented to

22   the user in the Lawson S3 procurement applications,

272

1   are those written in any particular language?

2   A.   Yes.

3   Q.   What language are those written in?

4   A.   I don't know. Lawson 4GL language.

5   Q.   So now you know?

6   A.   Well, the programmer will develop it

7   using Lawson 4GL language. What that gets

8   translated into, I don't know.

9   Q.   Okay. And who is doing the translation?

10   Is there a particular function in the software

11   that's doing translation or is there a programmer

12   doing that?

13   A.   The programmer is not doing that.

14   There's obviously some source code that is

15   combined -- or that is building a program based on

16   the different 4GL pieces.

17   Q.   Are you familiar with the web interface

18   in the procurement application for the S3 software?

19   A.   Yeah.

20   Q.   And if you call into your mind the web

21   interface that deals with keyword searching, when a

22   keyword is typed into that interface by the user,

273

1   can you describe for me what the software is doing

2   with that keyword once the user hits enter or

3   presses the search button?

4   A.   We are passing it off to a 4GL program

5   that is performing the search function.

6   Q.   And what's passing it off to the 4GL

7   function that's performing the search?

8   A.   The JavaScript code.

9   Q.   And do you know the names of that code

10   in particular?

11   A.   Not off the top of my head.

12   Q.   Is that something that you would have to

13   look at the source code to determine?

14   A.   Yes.

15   Q.   Do you know the names, if any, of the

16   4GL functions that's actually performing the

17   search?

18   A.   It's a 4GL program, RQIC.

19   Q.   That's the name -- That's the name of

20   the --

21   A.   That is the token name for that program,

22   yes.

274

1   Q.   Now, do you call that a 4GL program or

2   do you call that a Cobalt routine?

3   A.   I call it a 4GL program.

4   Q.   At Lawson, do you refer to the name, to

5   the language Cobalt at all?

6   A.   Sure.

7   Q.   In what context?

8   A.   In the context of talking Cobalt. I

9   mean, I don't know. The word Cobalt has been

10   uttered in the office, yes.

11   Q.   It's not like a bad word in the office,

12   is it?

13   A.   No.

14   Q.   I would like to go back to the

15   distinction between 4GL and Cobalt again, because

16   I'm not sure I understand really the programming

17   environment that we're going to have to talk about

18   all day tomorrow.

19   A.   Sure.

20   Q.   Are you familiar with the term IDE?

21   A.   Sure.

22   Q.   And what does that stand for, as far as

275

1   you know?

2   A.   I believe integrated development

3   environment.

4   Q.   Is 4GL an IDE?

5   A.   I wouldn't consider it that, no.

6   Q.   If I'm going -- If I'm a programmer and

7   I'm going to sit down and write in Lawson 4GL, how

8   am I doing that?

9   A.   Using the tools and means provided.

10   Q.   Is there an I -- Does Lawson provide an

11   IDE for Lawson 4GL?

12   A.   No. You would either have to be trained

13   by somebody or read a reference manual or stumble

14   through it and try to figure it out on your own.

15   Q.   In terms of syntax, is there any

16   difference between Cobalt and 4GL, Lawson 4GL?

17   A.   Well, 4GL encompasses more than just

18   procedure division.

19   Q.   Going back to what you said about Lawson

20   4GL being -- providing certain database

21   functionality that Cobalt did not have without

22   additional steps, is it fair to say that the

276

1   functionality and tools made available through

2   Lawson 4GL provide certain shortcuts to a Cobalt

3   developer?

4   A.   Yeah. Yes.

5   Q.   And those shortcuts would be specific to

6   the type of work that Lawson does and the business

7   that Lawson has?

8   A.   I mean, the shortcuts are not specific

9   to any particular application. They're specific to

10   writing a Lawson program.

11   Q.   The Lawson 4GL environment is not

12   available off the shelf, is it?

13   A.   I'm not understanding the question.

14   Q.   Like I couldn't go out and buy the

15   Lawson 4GL environment?

16   A.   You may be able to purchase it from

17   Lawson. I don't know that it would get you

18   anywhere.

19   Q.   Okay.

20   A.   It's part of the environment that we

21   sell.

22   Q.   You mentioned earlier that data is

277

1 stored for particular items in a database of some

2 sort, right?

3   A.   Yeah.

4   Q.   Could you describe for me the database

5 environment that that data is stored in?

6   A.   I'm not sure I understand the question.

7   Q.   What don't you understand about the

8 question?

9   A.   Well, I don't know what you mean by

10 "environment."

11   Q.   Is it stored in a Microsoft Access

12 database?

13   A.   No. I don't believe we support that.

14   Q.   Okay. What kind of database is it

15 stored in?

16   A.   I believe we support Oracle. And I

17 don't know all the databases we support off the top

18 of my head. That's something that the programmer

19 is not -- does not need to know.

20   Q.   Why doesn't he need to know that?

21   A.   We don't have -- We don't code directly

22 to a database, a particular database.

278

1   Q.   But these Lawson 4GL routines are kind

2 of -- provide transparency so that the developer

3 doesn't need to know anything about the database,

4 he can just use those routines, right?

5   A.   Correct.

6   Q.   Are you aware of any database schema for

7 the databases that are used in the Procurement

8 applications for S3?

9   A.   I'm not sure. It's a Lawson 4GL

10 database definition.

11   Q.   Is that stored somewhere in a text file

12 or something?

13   A.   It is stored within Lawson environment,

14 yes.

15   Q.   Have you ever seen an entity

16 relationship diagram done based on that?

17   A.   I have not, no.

18   Q.   How would you access that database

19 definition that you just referred to?

20   A.   There is a utility that is provided

21 within the Lawson environment, dbdef.

22   Q.   Is that the name of the utility?

279

1   A.   Yeah.

2   Q.   And what would I use that utility to do?

3   A.   To view database definitions, modify,

4 add, change, delete.

5   Q.   With respect to the item master

6 database, where is that definition found?

7   A.   Via dbdef. It's stored within the

8 Lawson environment.

9   Q.   Now, is that -- Is that a particular

10 table within the database, an item master table?

11   A.   Yes.

12   Q.   And so dbdef might be able to see all

13 the tables that relate to the Procurement

14 applications in S3, right?

15   A.   All applications, yes.

16   Q.   Are you aware that Lawson has provided a

17 demo machine for the S3 software in this litigation

18 to us?

19   A.   Yeah. Yes.

20   Q.   Is the dbdef utility available on that

21 demo machine?

22   A.   I would assume so, if you have a full

280

1 Lawson environment, yes.

2   Q.   And how do we access the dbdef utility

3 on that machine?

4   A.   You need to get to a -- You need to log

5 onto the environment and type in dbdef.

6   Q.   Where would you do that, at command

7 prompt?

8   A.   Command prompt.

9   Q.   That's all you need to do?

10   A.   Uh-huh.

11   Q.   When Lawson implements a system at one

12 of its customers, does it implement the same

13 database every time, or is there database

14 customization that's done for different customers?

15   A.   Lawson doesn't directly implement it.

16 The client would do that.

17   Q.   The client does what?

18   A.   Well, the client purchases the software.

19 They get an empty set of -- The database is empty

20 at that time. They buy the database outside of

21 Lawson, I believe, wherever they can. They buy the

22 applications from Lawson.

281

1   Q.   So does Lawson provide the create table

2   statements for the tables necessary to run the

3   software?

4   A.   I don't know how that works during the

5   install process. I mean, we provide the database

6   definitions that will then be turned into the

7   actual database tables, yes. They will get built

8   as part of the environment.

9   Q.   Okay. On the demo system, I have

10   noticed that there are two main user facing

11   portions of the system, one being through a web

12   browser --

13   A.   Yeah.

14   Q.   -- and the other being through what I've

15   seen called the Lawson Office. Are you familiar

16   with that terminology?

17   A.   I've heard the terms, yeah.

18   Q.   What's the difference between the user

19   facing program that you can access through the web

20   browser and the user facing programs that you can

21   access by codes like IC00 or IC00.5?

22   A.   Nothing in reality. They're just two

282

1   different languages of the interface where it's

2   coded in. I mean, you're still accessing -- We're

3   still using exact metadata to render the screens

4   and still using the identical back-end programs,

5   still accessing everything identically.

6   Q.   But Lawson intends its customers to use

7   the web-based version, right?

8   A.   That's up to the client.

9   Q.   Why would a client use the what seems to

10   me to be more clumsy version of everything

11   individually than the web-based?

12   A.   You would have to ask the client.

13   Q.   Have you seen some -- Have you seen a

14   client use the non-web-based version?

15   A.   Yes.

16   Q.   Do you know why that particular client

17   used a nonweb-based version?

18   A.   They liked it better. They were used to

19   it.

20   Q.   Do you know what client that was?

21   A.   No.

22   Q.   When was it? When did you see that?

283

1   A.   I don't recall. I've been at Lawson 20

2   years. I know clients still use multiple

3   interfaces we have provided over the years.

4   Q.   Do you have a name for the nonweb-based

5   version of that, of the procurement software?

6   A.   I would have to see which one you're

7   referring to.

8   Q.   The one where you can pull up IC00 and

9   IC00.5 directly.

10   A.   I need more information as to how you --

11   you can pull it up multiple ways, I guess. If I

12   saw it, I would know. I mean...

13   Q.   Are you familiar with something called

14   the Lawson Transaction Manager?

15   A.   Yeah.

16   Q.   What is that?

17   A.   It's again part of the environment that

18   basically manages system resources and memory while

19   different transaction programs -- or different

20   Lawson applications are running.

21   Q.   In the context of the procurement

22   application for S3, what types of things is the

284

1   Lawson Transaction Manager doing?

2   A.   To my knowledge, it's starting instances

3   or multiple instances of programs that are being

4   used at the time by users and managing resources in

5   the machine.

6   Q.   Are you aware of any documents

7   describing Lawson Transaction Manager in specifics?

8   A.   I have seen some documents, yes.

9   Q.   Are these documents that you've seen

10   directed specifically to the Lawson Transaction

11   Manager or do they encompass other things?

12   A.   They encompass other things.

13   Q.   Do you remember off the top of your head

14   the names of some of these documents?

15   A.   I don't off the top of my head.

16   (Exhibit 20 marked for identification and

17   attached hereto.)

18   BY MR. STEIN:

19   Q.   The court reporter has handed you a

20   document bearing the Bates numbers LE02388390

21   through LE02388669. It's been marked as Exhibit

22   No. 20.

285

1   I would ask you to take a minute or two

2   or however long you need to flip through this

3   document and let me know when you've finished.

4   A.   (Witness peruses document.)

5   Okay.

6   Q.   Do you recognize this document?

7   A.   I have seen similar documents, yes.

8   Q.   Well, let me make sure you're answering

9   the question that I'm asking. Do you recognize

10   this document?

11   A.   I don't know, but I have looked at a

12   document similar. I don't know if it was this

13   exact version.

14   Q.   Are you familiar with a document that is

15   entitled "Doc for Developers, Lawson 4GL

16   Application Program Interfaces"?

17   A.   Yes.

18   Q.   And what does that document contain?

19   A.   It appears to be a reference manual for

20   developers identifying available APIs for use in

21   developing a program.

22   Q.   And how does the Lawson programmer use

286

1   this document?

2   A.   They would use it as a reference manual.

3   Q.   When they're programming in Lawson 4GL?

4   A.   Yes.

5   Q.   Is this document kept in the ordinary

6   course of Lawson's business?

7   A.   Repeat that. I'm sorry.

8   Q.   Is this document kept in the ordinary

9   course of Lawson's business?

10   A.   I'm not sure what you mean by "kept."

11   Q.   Does Lawson keep this document in its

12   files?

13   A.   It's available through the documentation

14   interface, yes.

15   Q.   And the documentation interface, could

16   you describe that?

17   A.   Well, we have a document system where

18   clients can download documentation from.

19   Q.   And can Lawson employees also download

20   that documentation?

21   A.   I don't know if they can go the direct

22   route that the client would, but we could get

287

1   access to this, yes.

2   Q.   But this is a document that describes an

3   API, right?

4   A.   Sure.

5   Q.   Wouldn't the programmers at Lawson need

6   to know what's in this document?

7   A.   They may know it without looking at the

8   document.

9   Q.   But this is a Lawson document, right?

10   A.   Yeah. It's provided to clients to make

11   modifications to the source code. They may want to

12   use it.

13   Q.   And how often do clients -- How often,

14   to your knowledge, do clients make modifications to

15   the Lawson source code?

16   A.   I'm not sure how you want me to quantify

17   that but...

18   Q.   Is that something that happens

19   routinely?

20   A.   I would say yes.

21   Q.   What types of modifications do they

22   make?

288

1   A.   I -- I don't have specifics. They're

2   changing what is delivered, changing the

3   functionality of the delivered source code.

4   Q.   Can you recall any specifics as to

5   modification of Lawson source code by clients?

6   A.   No.

7   Q.   Directing your attention to page 103 of

8   Exhibit 20, which is on the page with the last four

9   Bates numbers 8492.

10   A.   Yep.

11   Q.   Directing your attention to the section

12   that's titled "840-FIND-INDEX." Do you see that?

13   A.   Yeah.

14   Q.   Is that a particular routine that's

15   available in Lawson 4GL?

16   A.   Yes.

17   Q.   How do we read the information that we

18   see here under the heading "840-FIND-INDEX"?

19   A.   How do we read it?

20   Q.   By that I mean how does a programmer use

21   the information that we see here?

22   A.   I'm at a loss for how to answer that

289

1 question.
2   Q.   Okay. What information is in the
3 description section of this?
4   A.   Describing what that API does.
5   Q.   And "the API" meaning the
6 840-FIND-INDEX?
7   A.   Correct.
8   Q.   So in the description section, that's
9 where we find a description of what this particular
10 routine is, correct?
11   A.   Yes.
12   Q.   And under the "Input Values" section,
13 what information is under the "Input Values"
14 section?
15   A.   An index value.
16   Q.   I'm talking -- Let me start over.
17   So the "Input Value" section describes
18 what arguments are expected by this particular
19 routine?
20   A.   It's telling you how to define the 840
21 find statement. Index is a variable that needs to
22 be supplied by the programmer.

290

1   Q.   Okay. And then the "Return Value"
2 section, does that describe what the result will be
3 provided by the routine itself?
4   A.   Yeah. Those are predefined responses
5 that come back from 840 find.
6   Q.   And then in the programming sample, does
7 that tell a reader of this document one particular
8 example of how to properly use this routine in a
9 program?
10   A.   Yes.
11   Q.   Is the description of the 840-FIND-INDEX
12 routine seen here on page 103 of Exhibit 20, is
13 that accurate with respect to that routine?
14   A.   To the best of my knowledge, yes.
15   Q.   Directing your attention to page 111 of
16 Exhibit 20 with the last four Bates 8500.
17   A.   Yeah.
18   Q.   The description of this
19 850-FIND-BEGRNG-INDEX routine says: "When you need
20 to process a range of data without interruption,
21 850-FIND-BEGRNG-INDEX retrieves the first database
22 record in a range."

291

1   Is this going to perform a search on the
2 database and return the first record in a result
3 set, or is this just going to find and return the
4 first result of a particular record set that
5 already exists?
6   A.   Can you rephrase that question?
7   Q.   Sure.
8   Well, let me ask you this question:
9 What is this routine shown here on 111 doing when
10 called?
11   A.   Well, it's going to retrieve the first
12 database record in a possible range based on the
13 keys provided.
14   Q.   Now, is the range going to be provided
15 to this routine in the index variable?
16   A.   No.
17   Q.   How is the range provided to this
18 routine?
19   A.   I mean, you need to provide the -- let's
20 try an example. You need to provide a portion of
21 the index or the particular index you've specified.
22   Q.   Could you explain that?

292

1   A.   You're looking for a set of records
2 based on a partial set of data provided to the
3 index. Show me all requisitions for a particular
4 requester, I guess, would be an example. If there
5 is an index that would allow that.
6   Q.   And in the context of databases, what's
7 your understanding of what an index is?
8   A.   It's a key or a path to the data. It
9 returns the data in a particular order and allows
10 you to access the data based on those keys.
11   Q.   Is the information that we see here on
12 page 111 with respect to the 850-FIND-BEGRNG-INDEX
13 routine accurate?
14   A.   To my knowledge, yeah.
15   Q.   Have you ever used this document or a
16 document similar to this in your job at Lawson?
17   A.   Many, many years ago, yes.
18   Q.   But now this information is second
19 nature to you?
20   A.   I don't use or code in 4GL anymore.
21   Q.   Do you code in something else, or do you
22 not code?

293

1   A.   Yeah, I code in something else.

2   Q.   What do you code in?

3   A.   HTML, JavaScript.

4   Q.   Could you describe for me how data is

5   loaded into the database for the S3 procurement

6   system?

7   A.   There are multiple ways.

8   Q.   Okay. What's the first way?

9   A.   Keyboard.

10   Q.   Okay. Can you just explain how to use a

11   keyboard to load data into it?

12   A.   You would call up a particular

13   application screen and key in the data that you

14   desire.

15   Q.   What application screen would you call

16   up?

17   A.   It depends on what you want to input

18   into the system.

19   Q.   Item data.

20   A.   IC11.

21   Q.   How would you use IC11 and a keyboard to

22   load item data into a Lawson S3 Procurement system?

294

1   A.   I would type.

2   Q.   What's displayed to the user, is it a

3   form?

4   A.   Yes.

5   Q.   What fields are available in the form?

6   A.   I don't know them all offhand. Item

7   number. Description. Various other attributes

8   about that item.

9   Q.   Okay. Besides manual entry of item

10   information, are there any other methods to input

11   item data information into the Lawson S3

12   Procurement system?

13   A.   Yeah. I believe we provide some import

14   programs.

15   Q.   What do you mean by "import programs"?

16   A.   They consume a CSV file and populate the

17   database.

18   Q.   And a CSV file is a comma-separated

19   value file?

20   A.   Yes.

21   Q.   Who provides the CSV file?

22   A.   The client. It would happen on the

295

1   client's site.

2   Q.   And these import programs, those are

3   written by Lawson, correct?

4   A.   Yes.

5   Q.   Do any of those import programs have

6   names like IC11?

7   A.   IC811.

8   Q.   IC811?

9   A.   Is its equivalent, yeah.

10   Q.   So that's for automatic load of item

11   data?

12   A.   I don't know if I would use the term

13   item automatic, but it's for importing a CSV file.

14   Q.   Why wouldn't you use the term

15   "automatic"?

16   A.   Well, you have to generate the CSV file,

17   you have to initiate the job. There is nothing

18   automatic about it.

19   Q.   How does the IC811 program work?

20   A.   It reads a CSV file and creates database

21   records.

22   Q.   So a user would direct the IC811 program

296

1   to a particular location where the program would

2   find the CSV file?

3   A.   Yes.

4   Q.   And once the user does that, then what

5   happens in the IC811?

6   A.   Could you repeat that question? Sorry.

7   Q.   Sure.

8   Once the IC811 program is told where to

9   find the CSV file, what happens next?

10   A.   Well, you initiate the job, you submit

11   the batch job.

12   Q.   Okay. And once that batch job is

13   submitted, then what happens?

14   A.   It consumes the CSV file or eats it and

15   creates item master records.

16   Q.   Is there a particular syntax that IC811

17   expects in the CSV file?

18   A.   There is a certain order to the fields

19   within the CSV file, yes.

20   Q.   And who determines what that order is?

21   A.   It's determined by Lawson.

22   Q.   And is that order for the CSV file, is

297

1   that written down in a document anywhere?

2   A.   Yeah.

3   Q.   Is there a name that you're aware of

4   that would describe that?

5   A.   I don't remember the name, but we have

6   looked at it earlier today.

7   Q.   Could you show me where?

8   A.   Maybe we didn't go over the IC811

9   itself. We did purchase order -- I'm sorry --

10   purchase orders, file layouts and requisition file

11   layouts. We did not go over IC811, as I recall

12   that.

13   MR. STEIN: Let's mark this as 21.

14   (Exhibit 21 marked for identification and

15   attached hereto.)

16   BY MR. STEIN:

17   Q.   The court reporter has handed you a

18   document that's been marked Exhibit 21 that bears

19   the Bates numbers L0030197.001 through 30197.052.

20   Do you recognize this document?

21   A.   I have seen similar documents. I have

22   never personally looked at this, though.

299

1   of 52?

2   A.   Yes.

3   Q.   Directing your attention back on the

4   first page of Exhibit 21, you'll notice that this

5   is noted as release 8.1, correct?

6   A.   Yes.

7   Q.   Do you know if this document exists for

8   release 9.0.1?

9   A.   I don't know but I would assume it

10   would, yes.

11   MR. STEIN: Mr. Schultz, to the extent

12   that this document exists for release 9.0.1,

13   ePlus would request that Lawson produce this

14   document for release 9.0.1.

15   MR. SCHULTZ: I will ask. If we have

16   it, we will produce it.

17   MR. STEIN: Thank you.

18   BY MR. STEIN:

19   Q.   Besides manual entry with IC11 and

20   nonmanual entry with IC811, are there any other

21   ways to load item data into the Lawson S3

22   Procurement system?

298

1   Q.   And what do you recognize those similar

2   documents as?

3   A.   Earlier today we looked at the

4   requisitions file layout and purchase order file

5   layout.

6   Q.   Does this document help you answer the

7   question of what the file format is for the IC811

8   CSV file?

9   A.   Yeah.

10   Q.   And on which page do we find that

11   information of this Exhibit 21?

12   A.   I'm sorry. I'm looking at page 4 of 52

13   labeled L0030197.004.

14   Q.   On page 4 of 52, is the way we read this

15   document that position 1 through 5 of the CSV file

16   will be the data that will be populated to the

17   item-group field in the database?

18   A.   Yes.

19   Q.   And that position 6 through 37 will

20   be the -- end up in the item database field?

21   A.   Correct.

22   Q.   And so on and so forth through page 10

300

1   A.   I believe there are some utilities

2   provided in the environment level that you could

3   use to populate the tables as well.

4   Q.   Could you describe how those utilities

5   work?

6   A.   Again, they take either a CSV file

7   or a -- I don't know the exact format of some of

8   them, but take flat files and import them into the

9   database.

10   Q.   In what instances are those utilities

11   used and not IC811?

12   A.   I would say they're used more once a

13   client has data populated in one system and they

14   may want to transfer or mimic that data in another

15   product line for testing purposes.

16   Q.   Do you consider the IC811 program to be

17   a stand-alone program in the Lawson S3 Procurement

18   application?

19   A.   I'm not sure what you mean by

20   "stand-alone."

21   Q.   Withdraw that question.

22   MR. STEIN: Let's take a break.

301

1   THE VIDEOGRAPHER: This marks the end of

2   Volume 1, Tape No. 4, in the deposition of Todd

3   Dooner. Going off the record. The time is

4   6:01 p.m.

5   (The deposition was recessed at 6:01 p.m.)

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303

1   REPORTER'S CERTIFICATE

2

3   I, the undersigned Registered Professional

4   Reporter and Notary Public, do hereby certify that

5   TODD DOONER, after having been first duly sworn by

6   me to testify to the truth, did testify as set forth

7   in the foregoing pages, that the testimony was

8   reported by me in stenotype and transcribed under my

9   personal direction and supervision, and is a true

10   and correct transcript.

11   I further certify that I am not of

12   counsel, not related to counsel or the parties

13   hereto, and not in any way interested in the outcome

14   of this matter.

15   SUBSCRIBED AND SWORN TO under my hand and

16   seal this 8th day of March, 2010.

17

18   _____

19   JOHN L. HARMONSON, RPR

  .   Notary Public in and for

20   the District of Columbia

  .   My Commission Expires: 10/14/2010

21

22

302

1   WITNESS CERTIFICATE

2

3   I, TODD DOONER, have read or have had the

4   foregoing testimony read to me and hereby certify that

5   it is a true and correct transcription of my testimony

6   with the exception of any attached corrections or

7   changes.

8

9   _____

10   TODD DOONER

11   [ ] No corrections

12   [ ] Correction sheet(s) enclosed

13

14   SUBSCRIBED AND SWORN TO BEFORE ME, the

15   undersigned authority, by the witness, TODD DOONER, on

16   this the _____ day of _____, _____.

17

18   _____

19   NOTARY PUBLIC IN AND FOR

20   THE STATE OF _____

21   My Commission Expires: _____

22

304

1   CHANGES AND SIGNATURE

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1            IN THE UNITED STATES DISTRICT COURT
2            FOR THE EASTERN DISTRICT OF VIRGINIA
3                     Richmond Division
4
5       _____
   .                              )
6      ePLUS INC.,          )     Civil Action
   .                         )
7          Plaintiff,     )     No. 3:09-CV-620 (JRS)
   .                         )
8      vs.              )
   .                         )
9      LAWSON SOFTWARE, INC.,  )
   .                         )
10         Defendant.     )
   .     _____)
11
12              C O N F I D E N T I A L
13
14      Videotaped Deposition of TODD DOONER
15     Individually and as Corporate Designee of
16          LAWSON SOFTWARE, INC.
17              Washington, D.C.
18           Tuesday, March 2, 2010
19                 9:17 a.m.
20     Job No.:  1-174254
21     Pages:  306 - 413, Volume 2
22     Reported by:  John L. Harmonson, RPR
```

308

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1                     APPEARANCES
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21          AKIM GRAHAM, Videographer
22
```

307

```
1
2
3      Videotaped Deposition of TODD DOONER
4     Individually and as Corporate Designee of
5          LAWSON SOFTWARE, INC.
6
7
8
9      Held at the offices of:
10         GOODWIN PROCTER, LLP
11           901 New York Avenue, N.W.
12           Washington, D.C.  20001
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15
16      Taken pursuant to the Federal Rules of Civil
17     Procedure, before John L. Harmonson, Registered
18     Professional Reporter, Notary Public in and for the
19     District of Columbia, who officiated in administering
20     the oath to the witness.
21
22
```

309

```
1              EXAMINATION INDEX
2                     PAGE
3      EXAMINATION BY MR. STEIN          311
4
5              * * * * *
6
7
8              EXHIBIT INDEX
9         (No exhibits identified.)
10
11
12
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14
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22
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310

1   P R O C E E D I N G S
2   TODD DOONER,
3   after having been first duly sworn, was examined
4   and did testify under oath as follows:
5   THE VIDEOGRAPHER: Here begins Tape
6   No. 1, Volume 2, in the continuing deposition of
7   Todd Dooner.
8   Today's date is March 2nd, 2010. We are
9   back on the record. The time is 9:17 a.m.
10   MR. STEIN: Just go around the table and
11   identify people who are in the room.
12   So I'm Andrew Stein from Goodwin Procter
13   on behalf of ePlus, and with me is Patrick
14   Niemeyer, a disclosed expert in the case. And also
15   with me is Jennifer Albert, also from Goodwin
16   Procter, on behalf of ePlus.
17   MR. SCHULTZ: William Schultz of
18   Merchant & Gould on behalf of Lawson Software, Inc.
19   MR. STEIN: Let's go off the record for
20   a second.
21   THE VIDEOGRAPHER: Going off the record.
22   The time is 9:18 a.m.

311

1   (Off-the-record discussion.)
2   THE VIDEOGRAPHER: Back on the record.
3   The time is 9:20 a.m.
4   EXAMINATION
5   BY MR. STEIN:
6   Q.   Welcome back, Mr. Dooner. Again, my
7   name is Andrew Stein. I'm representing ePlus,
8   and we'll be continuing your deposition today, and
9   today we'll be focusing on the source code.
10   A.   Okay.
11   Q.   And I know that Jennifer went over some
12   ground rules with you yesterday as far as the
13   deposition goes, so I won't go over those again.
14   But I will ask you now if you understand
15   that you are still under oath?
16   A.   Yes.
17   Q.   And we have the source code for the
18   system in front of you, and we're recording that
19   through various means, as we've discussed prior to
20   the deposition.
21   And if you're going to begin referring
22   to the source code and you're going to be looking

312

1   at things in the source code, then I would just ask
2   that you say that you're going to be going into the
3   source code or whatever you want to say.
4   A.   Sure.
5   Q.   Just to let us know what you're going to
6   be doing.
7   A.   Yeah.
8   Q.   Thank you.
9   So first I would like to talk about
10   searching by keyword in the Lawson S3 Procurement
11   system. And it is possible to search by keyword in
12   the Lawson S3 Procurement system, correct?
13   A.   Not in Lawson S3 Procurement. In
14   Requistion Self-Service, yes.
15   Q.   Okay. Sorry. The terminology, I've got
16   to get that straight.
17   So the Requistion Self-Service, what do
18   you call that? Is that a portion of the S3 system
19   or is that a stand-alone?
20   A.   It's a stand-alone application.
21   Q.   So you're comfortable if I refer to that
22   as the Requistion Self-Service module?

313

1   A.   Yes.
2   Q.   Okay. So it is possible to search by
3   keyword in the Requistion Self-Service module,
4   correct?
5   A.   Yes.
6   Q.   At a high level, could you explain what
7   happens in the source code after a user types a
8   particular keyword into the keyword search box and
9   then hits search.
10   A.   Yeah. At that point a 4GL application
11   is initiated that performs database access to try
12   to match the keyword entered within the search box
13   to those keywords stored within that database
14   table.
15   Q.   Can you search by partial keyword, or
16   would it have to match a whole keyword?
17   A.   It would have to be the whole word.
18   Q.   So if I wanted to search for items that
19   were red, I wouldn't be able to search for r-e, I
20   would have to type in r-e-d to match red items,
21   correct?
22   A.   Correct, yes.

314

1   Q.   Are there -- When you type in a keyword,
2   what fields is that search searching?
3   A.   That depends on what you have designated
4   as your searchable keywords.
5   Q.   Is the universe of searchable keywords
6   closed?
7   A.   Yeah. It's finite, a finite set of
8   fields.
9   Q.   And who determines the composition of
10   that universe of searchable keywords?
11   A.   The client can choose from those that
12   have been programmed.
13   Q.   Can you give me an example of any of the
14   keywords that are in this universe?
15   A.   The item number field, the item
16   description. There's upwards of 30; I don't know
17   the exact number.
18   Q.   Okay. Is there a document or anything
19   that would list the searchable keyword fields?
20   A.   I don't know of any document. I would
21   look through the source code.
22   Q.   Is there a particular 4GL routine or

315

1   something that would show that?
2   A.   IC00, program IC00, Screen 5
3   specifically.
4   Q.   Could you search by price?
5   A.   No.
6   Q.   Is price information stored in the
7   Lawson -- in the database anywhere?
8   A.   Sure.
9   Q.   Do you know where that's stored?
10   A.   Not exactly. In multiple places.
11   Q.   Is it stored in the item master table?
12   A.   No.
13   Q.   If it's not stored in item master, where
14   else might it be stored?
15   A.   Several other tables depending on the
16   pricing methods and...
17   Q.   What pricing methods are you aware of?
18   A.   Average, standard, LIFO and FIFO.
19   Q.   And those are four different pricing
20   methods?
21   A.   Yes.
22   Q.   And the standard -- In the case of the

316

1   standard pricing method, what does that mean,
2   standard pricing method?
3   A.   I'm not exactly sure of the definition.
4   Q.   Okay. In the case of the standard
5   pricing method, where would the pricing information
6   be stored?
7   A.   I don't know exactly.
8   Q.   Would you be able to look and find out?
9   A.   It would take me quite a while. There's
10   various routines to determine the price based on
11   whether the item is on a contract, the last
12   purchase price, whether it's inventory or nonstock,
13   that type of thing.
14   Q.   Is pricing information stored in the
15   vendor item table?
16   A.   No.
17   Q.   You mentioned that after the search
18   button is pressed in the Requistion Self-Service
19   module that a 4GL routine executes?
20   A.   Yes.
21   Q.   Does that routine have a name?
22   A.   Yes. I believe it's RQIC.

317

1   Q.   And is that the first 4GL routine that
2   executes when the search button is pressed?
3   A.   Yes.
4   Q.   And is there -- Are there any other
5   Lawson 4GL routines involved in searching for a
6   keyword?
7   A.   Not that I'm aware of, no.
8   Q.   When -- how is the -- How is the search
9   string passed to the RQIC 4GL routine?
10   A.   Via an HTTP request as a parameter
11   delimited string.
12   Q.   Is that parameter delimited string
13   passed directly into Lawson 4GL or does it -- is it
14   handled by Java, JavaScript or any other --
15   A.   It's passed to our environment layer
16   which initiates the 4GL program.
17   Q.   And the 4GL program, again, it's
18   initiated as the RQIC program?
19   A.   For searching, yes.
20   Q.   Do you refer to those -- and by "those,"
21   I mean RQIC and others like it. Do you refer to
22   them as programs, routines, functions? How do you

318

1   refer to them?

2   A.   All of the above, I guess.

3   Q.   Okay. I just want to make sure that the

4   terminology that I use is the same that you use.

5   So could you explain to me how the RQIC

6   routine searches the database for the search

7   string?

8   A.   It would use what we went over

9   yesterday. Some of the canned IOS routines that

10   are provided as part of the 4GL environment to

11   access and read the database and do basically a

12   Cobalt string compare to see if the values are

13   equal.

14   At that point, if we do find a match,

15   gather the necessary item master information, and

16   it generates an output file that is later consumed

17   by the applications.

18   Q.   Okay, now if I were to ask you on a

19   source code level to explain that process, could

20   you show us how that works?

21   A.   What process?

22   Q.   So the RQIC routine is, you said, the

319

1   only Lawson 4GL routine that's involved in a

2   keyword search, correct?

3   A.   Yeah.

4   Q.   Could you explain how the source code of

5   the RQIC routine is doing what you just described

6   in doing a compare and returning a file?

7   A.   I would have to search through the code.

8   Q.   Okay. Please go ahead.

9   A.   What specific portion would you like to

10   see?

11   Q.   I would like to understand how the RQIC

12   routine will take an inputted search string and

13   search the database and find results or not, and

14   then return what it's going to return.

15   A.   That's a lot of stuff there. RQIC

16   doesn't accept the search string itself.

17   Q.   Okay. What accepts the search string

18   itself?

19   A.   That's the environment level.

20   Q.   Okay. And does that have a name?

21   A.   LSF, Lawson System Foundation.

22   Q.   And that's the entire name of that file,

320

1   it's not LSFPD?

2   A.   It's not a file; it's a product. It's

3   something that the application is run on.

4   Q.   Okay. And the search string gets passed

5   from LSF into RQIC?

6   A.   It's passed into a servlet that IOS or

7   LSF -- they're synonomous -- provides.

8   Q.   Okay. And does that servlet have a

9   name?

10   A.   It's transactional servlet in this case.

11   Q.   Is that the Lawson Transaction Manager?

12   A.   No.

13   Q.   Okay. So the transaction servlet, what

14   is the next step for the search string after that?

15   A.   The next step for the search string?

16   Q.   Yeah.

17   A.   I'm not sure I follow what you're

18   saying.

19   Q.   Okay. So the search string gets passed

20   from the HTTP box, correct, into LSF?

21   A.   Yeah.

22   Q.   And after LSF, what's the next step in

321

1   the program to complete the search?

2   A.   It would launch the RQIC program.

3   Q.   Okay. And does it launch it with any

4   particular argument? How does RQIC know what to

5   search for?

6   A.   It would populate the screen fields that

7   are present within the RQIC program.

8   Q.   LSF would?

9   A.   Yes.

10   Q.   And once those fields are populated,

11   RQIC would know that those are the input fields,

12   that's what it's searching for?

13   A.   That's part of the criteria, yes.

14   Q.   Okay. So at any point do any of those

15   screen fields get populated with the search string?

16   A.   Yes.

17   Q.   What field is that?

18   A.   I don't know offhand.

19   Q.   Okay. Could you check?

20   A.   I believe it's this include -- No.

21   That's ignore. Where's the include keyword?

22   I would normally not look here to find

322

1   it, but...

2   Q.   Where would you look?

3   A.   I would look within the RSS application

4   to see what I'm feeding.

5   It would be this field here, I believe,

6   which I believe is the include keyword referencing

7   the source code here.

8   Q.   So the search string would be --

9   A.   Passed into a variable --

10   Q.   Okay.

11   A.   -- within RQIC.

12   Q.   So what we're looking at on the screen

13 is the file RQIC.scr?

14   A.   Correct.

15   Q.   And do you consider that to be a part of

16 the RQIC routine?

17   A.   I consider it to be a part of the

18 program, yes.

19   Q.   Okay. Besides RQIC.scr, are there any

20 other parts of the RQIC program?

21   A.   Yes.

22   Q.   What are they?

323

1   A.   The RQICWS and the RQICPD.

2   Q.   And can you explain the difference

3   between RQIC.scr and RQICWS and RQICPD?

4   A.   They are components that make up 4GL

5   pieces of a Lawson transaction program.

6   Q.   Does PD stand for anything?

7   A.   Procedure division.

8   Q.   What about SCR?

9   A.   Screen.

10   Q.   And WS?

11   A.   Working storage.

12   Q.   And can you explain how those three

13 pieces work together, if at all, to perform a task?

14   A.   Again, they are -- they're interpreted

15 or combined at compile time to generate an object

16 or a -- a compiled object that is executed. I

17 believe the screen is interpreted by the

18 environment to display the actual screen itself.

19   Q.   So the logic of the program, is that in

20 the PD file?

21   A.   Most of it. There may be associated

22 common routines that would get compiled with it.

324

1   Q.   So RQICPD is the only PD file involved

2   in a keyword search; is that right?

3   A.   There may be associated common routines

4   with that designation. I don't know how the

5   programmer named some of the other files. But that

6   is the main logic for that program, yes. It's the

7   driver.

8   Q.   Is there any way to determine whether

9   other PD files are involved by looking at RQICPD?

10   A.   Not easily, unless you knew exactly what

11 the routine names were. You could tell by

12 generating or compiling a program, probably.

13   Q.   What about ICIC3SPD?

14   A.   ICIC3?

15   Q.   ICIC3SPD.

16   A.   I don't know what that is offhand,

17 without seeing it anyway.

18   Q.   What about RQGILXMLPD?

19   A.   That sounds like a common library.

20   Q.   Is the Lawson 4GL code compiled or

21 interpreted by the Lawson Transaction Manager?

22   A.   It's compiled code.

325

1   Q.   So back for -- Back on RQICPD, can you

2   walk us through RQICPD and show us where the

3   different steps are going to be occurring that will

4   cause the database to be searched for the

5   particular keyword?

6   A.   Can you be a little more specific?

7   What -- I mean, there's --

8   Q.   Okay. So at one point we discussed that

9   the keyword is passed into this program, correct?

10   A.   Sure.

11   Q.   Okay. Now, what's the next step? Once

12 the keyword is passed into RQICPD, what happens

13 next?

14   A.   Start it, perform 2000 move to object, I

15 would assume.

16   Q.   You would assume. Do you know that

17 that's what happens?

18   A.   Yes.

19   Q.   Okay. What happens next?

20   A.   I guess it depends on what 2000 move to

21 object is.

22   Q.   All right. And what does that do?

326

1   A.   It looks like it's moving fields from

2   the screen to a working storage fields.

3   Q.   Can you show us where in RQICPD the

4   string is actually searched for in the database?

5   A.   I can look, yes.

6   It looks like the logic may exist in a

7   common routine that gets compiled into RQIC.

8   Q.   What is the name of the common routine?

9   A.   I don't know offhand, but it looks like

10   performs 2000 RQIG load XML doc. Which may be this

11   routine you have loaded. Yeah.

12   So it's including a common set of code,

13   including it in the compiled object.

14   Q.   Okay. So how does this compare the

15   search string to the database? And by "this," we

16   mean RQGILXMLPD is doing that?

17   A.   Yes.

18   Q.   And in particular, what function in that

19   file?

20   A.   I don't know offhand. ICIC3, that's --

21   It looks like it's in this routine that

22   you brought up earlier, the ICIC3, which I don't

327

1   know what common routine that is a part of, offhand

2   anyway. It does not exist in this particular PD.

3   Q.   So the 2000-ICIC3-SEARCH routine is the

4   one that's actually querying the database for that

5   particular string?

6   A.   I don't know without seeing it again.

7   It appears to be, but...

8   Q.   Is that routine 2000-ICIC3-SEARCH

9   located in the ICIC3SPD?

10   A.   Possible.

11   Q.   Could we pull up ICIC3SPD? It's right

12   there at the top. Oh, sorry.

13   A.   Which one?

14   Q.   Your mouse is basically on it.

15   A.   I believe it's happening in this 4085 --

16   4085-SEARCH routine of ICIC3SPD, or it's reading

17   the keyword initiating with the keyword setup,

18   creating the keyword setup table.

19   Q.   So this is actually searching the

20   database here?

21   A.   Well, the find is retrieving a record --

22   attempting to retrieve a record.

328

1   Q.   Which find are you referring to?

2   A.   Oh, sorry. Perform

3   850-FIND-BEGRNG-ICKSET1.

4   Q.   Okay. Now, is it searching all the

5   fields in a database or is it searching an index of

6   the database?

7   A.   In this case it's using an index.

8   Q.   Are there any other cases that it would

9   search every field in the database for the

10   particular string?

11   A.   In regards to doing what? I mean...

12   Q.   A keyword search.

13   A.   It's going to retrieve -- You know,

14   without stepping through this going line by line

15   and interpreting what it's doing, I'm just grasping

16   at bits and pieces of what's going on here.

17   Q.   Okay.

18   A.   I mean, nobody is going to know what

19   this does without stepping through it and

20   interpreting it and learning again or re-evaluating

21   what it's doing. But at this point it's reading an

22   index, specifically ICKSET1. It's using an index

329

1   to retrieve it looks like in this case a range of

2   records.

3   Q.   And that's the result set, a range of

4   records?

5   A.   It will give you a pointer into a result

6   set, yes.

7   Q.   And after it returns that pointer, what

8   happens next?

9   A.   It looks like we are attempting to read

10   another file at that point. Or reading the same

11   file with a different index. I guess I'm not

12   100 percent clear on exactly how it's doing the

13   search. I mean, we're searching --

14   Depending on the keywords that were

15   selected, we're comparing it against multiple

16   fields within that keyword table. So I can't just

17   interpret it by our just spending a couple minutes

18   looking at it here. I mean, to me, to tell you

19   exact details as to what it's doing but...

20   Q.   How much time would you need to do that?

21   A.   Probably a good hour. I would probably

22   have to debug the program and step through it to

330

1 understand what it's doing.

2   Q.   If and when results are found, how are

3 those results passed back to the user interface?

4   A.   In the case of RQIC, it generates an XML

5 output file that -- to start under the system.

6   Q.   Okay. And so once the RQIC generates

7 that XML file, what interprets that XML file and

8 displays it to the user?

9   A.   The RQIC -- or excuse me -- The RSS

10 logic will consume that file and format it for

11 viewing in the search results area.

12   Q.   The index that you mentioned was being

13 searched by the code that we looked at a little bit

14 earlier. Could you display that on the screen

15 again? What does that index consist of?

16   A.   I don't know offhand.

17   Q.   How would you tell what makes up that

18 index?

19   A.   I would look at the definition of that

20 particular table.

21   Q.   Which table?

22   A.   It looks like in this case it's keyword

331

1 setup.

2   Q.   Would it be located -- Would a

3 description of that be located in the comments at

4 the top of the file?

5   A.   I don't believe so, no. Unless a

6 programmer decided to put it in there. I wouldn't

7 think that's common practice, though. That may

8 change over time or... It's not common practice

9 anyway.

10   Q.   What is a database index?

11   A.   What is a database index?

12   Q.   Yes.

13   A.   It's a set of fields that define access

14 to various records within that database.

15   Q.   So when you search an index, are you

16 searching the entire database or are you searching

17 a small subset of that?

18   A.   Well, in theory, you're searching the

19 entire database but it's returning you a subset

20 based on the index.

21   Q.   Now, that routine that you said was

22 searching the index, where is that defined?

332

1   A.   Where is what defined?

2   Q.   The 850 -- whatever the -- If we could

3 go back down to the routine that was searching,

4 that you said.

5   So the 850-FIND-BEGRNG-ICKSET1 is

6 searching the database index for the keyword search

7 string, correct?

8   A.   It's initiating the process, yes.

9   Q.   Is that written in the ICIC3SPD file?

10   A.   Is what written there?

11   Q.   850-FIND-BEGRNG.

12   A.   No.

13   Q.   Where is that written?

14   A.   That's part of the environment that

15 gets -- it's a -- it's part of the environment that

16 does the database lookup. It's kind of hidden from

17 developers.

18   Q.   Can we use Exhibit 20, the "Doc for

19 Developers Lawson 4LG Application Program

20 Interfaces," to understand how that function works?

21   A.   The 850-FIND?

22   Q.   Yeah.

333

1   A.   I think it would explain -- It mentions

2 it and tries to describe what it's doing, yes.

3   Q.   And does Exhibit 20, the application

4 program interfaces, does that explain all the

5 functions available at the foundation level?

6   A.   I believe for database access, yes.

7   Q.   If a foundation level function is not

8 described in that document, where else would it be

9 described?

10   A.   I have no idea.

11   MR. STEIN: All right. Let's take a

12 break.

13   THE VIDEOGRAPHER: Going off the record.

14 The time is 9:54 a.m.

15   (A recess was then taken.)

16   THE VIDEOGRAPHER: Back on the record.

17 The time is 10:12 a.m.

18 BY MR. STEIN:

19   Q.   I would like to go back to the index

20 used in keyword searching for a minute.

21   A.   Uh-huh.

22   Q.   Does the keyword index that's searched

334

1   in a keyword search, does that map particular

2   keywords to particular items in some fashion?

3   A.   Does the index?

4   Q.   Yeah.

5   A.   No.

6   Q.   Okay. What does that index look like?

7   A.   I don't know offhand. I mean, I would

8   have to look it up.

9   Q.   Okay. Please look it up.

10   A.   Do you have the Lawson environment

11 loaded?

12   Q.   What's the Lawson environment?

13   A.   I need to access the dbdef utility.

14   Q.   Okay. How would you use dbdef to look

15 at the index?

16   A.   That's -- The purpose of the utility is

17 define and view and change, modify the indexes and

18 files within the Lawson system.

19   Q.   Can you look at .TBL files to determine

20 that?

21   A.   Dot what?

22   Q.   TBL.

335

1   A.   I have no idea what those are.

2   Q.   Could you explain for us how in a

3   keyword search the index is used to find matching

4   items?

5   A.   The index itself isn't used to find

6   matching items.

7   Q.   In a keyword search, you mentioned

8   before, correct, that an index is queried to

9   determine whether there are any matches to that

10 keyword?

11   A.   I'm not sure I stated it that way.

12   Q.   Okay. Well, how does that work, then?

13   A.   How does what work?

14   Q.   Keyword search.

15   A.   It will access the necessary tables to

16 retrieve records to attempt a match to the search

17 parameter entered.

18   Q.   Okay. How does -- How are the necessary

19 tables determined?

20   A.   It's part of the Lawson system, the way

21 it was built. I mean, the table is defined, given

22 a name.

336

1   Q.   Okay. Let's go back to this

2   850-FIND-BEGRNG for a minute.

3   A.   Yeah.

4   Q.   Could you explain what that's doing

5   again?

6   A.   It's grabbing or -- the way I'm

7   viewing -- or the way I'm stating it, it's setting

8   a pointer within the keyword setup table, at this

9   point using ICKSET1 as the index.

10   Q.   Now, ICKSET1 is an index, correct?

11   A.   Yes.

12   Q.   Is that a database index?

13   A.   Uh-huh.

14   Q.   So what is the 850-FIND-BEGRNG doing to

15 that index?

16   A.   It's doing nothing to the index. I'm

17 not sure I follow your question.

18   Q.   So that index is being passed into that

19 routine, correct?

20   A.   Yeah.

21   Q.   Okay. So what is the routine

22 850-FIND-BEGRNG doing to or with the index that's

337

1   passed into it?

2   A.   It's generating or using the associated

3   sequel statements that are part of what an

4   850-FIND-BEGRNG does, as part of the environment

5   level again. I mean, programmers are going to

6   that -- what's happening there. There is no need

7   to learn different database access methods,

8   basically.

9   But I mean as far as the details of what

10 it's doing, I don't know.

11   Q.   Do you know what the keyword detail file

12 is, KWDDETAL?

13   A.   It's another associated file with

14 keywords, yeah.

15   Q.   What's the purpose of that file?

16   A.   I don't know specifically. They're all

17 related to keyword storage and maintenance.

18   Q.   How would you find out specifically if I

19 wanted to know what the keyword detail file is?

20   A.   I would go to dbdef again and start

21 there. That would be my first place I would start.

22   Q.   It's my understanding that everything

338

1   that Lawson has produced with respect to the source

2   code is on that machine. So if there is something

3   that you're saying that you need, it should be on

4   that machine. And if it's not, then we request

5   that it be produced. So if you need to look at

6   dbdef, then it's on there somewhere.

7   A.   You need to have a running Lawson

8   environment. I mean, you need to have it up and

9   running so you can execute applications, database

10   loaded. Dbdef is not something that just -- It's a

11   program that runs within Lawson environment. If

12   you have a Lawson running environment, I would be

13   happy to show you. I don't know how to access it

14   from here.

15   Q.   Do you know how dbdef reads database

16   information?

17   A.   I have no idea.

18   Q.   Does Lawson write that dbdef?

19   A.   I believe so, yes.

20   Q.   Do you know where dbdef looks to find

21   the information that it interprets?

22   A.   I have no idea.

340

1   keys to the index"?

2   A.   Indexes are set up with key fields that

3   allow you access to that data. They're required to

4   access the data using that index.

5   Q.   So what's being passed into 850-FIND, is

6   that the keyword that you've typed in?

7   A.   No.

8   Q.   Okay. So can we liken a database index

9   to the index in a book?

10   A.   I wouldn't, no.

11   Q.   Okay. Is there any other analogy that

12   you would use to describe an index, a database

13   index?

14   A.   Not off the top of my head, no.

15   Q.   Is it fair to say that a database index

16   is -- say you look in the index in a book and there

17   is a word red and it gives you a page number.

18   A.   Okay.

19   Q.   So you find red in the index and then

20   you go to the page number to find certain data.

21   Isn't that's what happening in a database index?

22   A.   I wouldn't describe it that way, no.

339

1   Q.   In a keyword search when the index is

2   being searched, once it finds the keyword, will it

3   stop?

4   A.   The index is not being searched.

5   Q.   Okay. What is being searched, then?

6   A.   The database table is being -- records

7   are being retrieved from the database table.

8   Q.   How are they being retrieved from the

9   database?

10   A.   Using Lawson-provided APIs.

11   Q.   One of which is the 850-FIND?

12   A.   Correct. It does not -- It knows

13   nothing about a search.

14   Q.   What knows nothing about a search?

15   A.   An 850-FIND. It knows nothing about

16   keyword search.

17   Q.   But what that routine, 850-FIND is doing

18   is it's looking at one thing for a value that's

19   been passed in?

20   A.   You're supplying keys to the index to

21   retrieve a set of records.

22   Q.   What do you mean by "you're supplying

341

1   Q.   Okay. Could you explain how you would

2   describe it?

3   A.   To me, it's a -- Well, to me it's a sort

4   order of the data that will be returned to you

5   based on the index keys.

6   Q.   When are the index keys generated?

7   A.   When they -- The keys are predefined. I

8   mean, they're not generated on the fly or anything.

9   They are set by Lawson or set by the programmer or

10   an analyst or a developer.

11   Q.   And is that back in the keyword search

12   setup that we talked a little bit about earlier?

13   A.   No.

14   Q.   So you have this -- you have this

15   keyword that's been typed into a search box, right?

16   Eventually does the Lawson program query a database

17   index to determine whether there are any matching

18   items?

19   A.   I wouldn't state it in those terms, no.

20   Q.   Why wouldn't you state it in those

21   terms?

22   A.   Because the search term and querying the

342

1 index are two separate things.

2   Q. What do you mean that they're two

3 separate things?

4   A. Search term plays no part in retrieving

5 the data.

6   Q. How can you say that the search term

7 plays no part in retrieving the data when that's

8 what is being searched for?

9   A. It's not dictating what data we're

10 retrieving.

11   Q. What is dictating what data is being

12 retrieved?

13   A. The fields that we're searching, that

14 are being searched. Whatever a search group is at

15 this time I'm not sure off the top of my head.

16 We're basically accessing all the records within

17 that keyword list.

18   Q. If I type the word red into the keyword

19 search field, how is the program going to determine

20 whether there are any red items in the database,

21 and if so, return a list of those red items to me?

22   A. As I stated earlier, it's going to

343

1 retrieve or read records from the keyword or

2 keyword -- or multiple keyword tables. There is a

3 header detail. I don't know all the tables

4 offhand. Retrieve those records and

5 programmatically compare whether the keywords match

6 what was keyed in on the search criteria.

7   Q. What data is stored in the keyword

8 tables?

9   A. I don't know all of it offhand.

10   Q. You would have to look at dbdef again?

11   A. Correct.

12   Q. Do you know any of the data that's

13 stored in keyword tables, offhand?

14   A. I would say there's a keyword.

15   Q. And would a keyword be, in our example,

16 the word red?

17   A. Sure.

18   Q. Okay. And so besides the keyword, what

19 other data would be stored, to your knowledge?

20   A. I -- I don't know. I mean, I know there

21 is a link probably back to the originating item

22 master records to somehow get that record.

344

1   Q. So if I type in a keyword in the search

2 box that's not in the keyword tables, what happens?

3   A. You're going to get no results.

4   Q. Does 4085-SEARCH use

5 850-FIND-NLT-IC2SET2?

6   A. I'm sorry, which 4085?

7   Q. Yeah, does 485 search use

8 850-FIND-NLT-IC2SET2 to find search keywords in the

9 KWD -- in the KWD detail table?

10   A. Are you looking at code there? Or point

11 me. Am I in the right area?

12   Q. In the 4085-SEARCH function.

13   A. Oh, let's see.

14   Q. I would like you to look in 4085-SEARCH

15 where it says: "Move ICIC3WS-INCL-KEYWORD"?

16   A. Yep, I see it now --

17   Q. Okay. Now --

18   A. -- on the screen.

19   Q. Now, does 4085-SEARCH use

20 850-FIND-BEGRNG-IC2SET2 --

21   A. Yes.

22   Q. -- to find search keywords in the

345

1 keyword detail table?

2   A. I'm just trying to make sure it's the

3 right table.

4   Yes, it does appear that.

5   Q. Does the keyword detail table map back

6 to particular items?

7   A. Yes, to the item master.

8   Q. Is it possible to conduct Boolean

9 searching with keywords?

10   A. We don't do "ands" and "ors." I believe

11 we allow you more than one keyword, though.

12 Essentially an "and." I don't believe we allow

13 "ors."

14   Q. So if I were to type red blue with a

15 space in between them in the keyword search blocks,

16 that would search for all items that are red and

17 blue?

18   A. Correct.

19   Q. Or have red and blue as keywords?

20   A. Yes, exactly.

21   Q. Let's say I've searched for the keyword

22 red and results are returned. Is it possible to

346

1   conduct an additional keyword search only on those

2   results that have been returned from the first

3   keyword search?

4   A.   Within RSS?

5   Q.   Yes.

6   A.   No.

7   Q.   Could you list the types of databases

8   used by the system on its various platforms?

9   A.   I don't know all of them.

10   Q.   Could you name the ones you do know?

11   A.   I know Oracle is supported.

12   Q.   How about MS SQL?

13   A.   I'm not sure. I would be guessing at

14 any others.

15   Q.   ISAM?

16   A.   I don't know.

17   Q.   Are you familiar with the term "product

18 line" in the application?

19   A.   Uh-huh.

20   Q.   Can you describe what is meant by

21 product line in the application and how it relates

22 to the tables used in the database?

347

1   A.   It's just a designation of those -- it's

2   a hierarchy or owner of the tables within -- It's a

3   name given to your application space.

4   Q.   Could you describe how the 4GL

5   application screens are rendered in the portal?

6   A.   How they're rendered? I'm not sure what

7   you're asking there.

8   Q.   The SCR files that we were talking about

9   earlier, are those used to produce web content

10 that's seen by the user?

11   A.   You know, I don't know if those are used

12 specifically, but I believe they're interpreted and

13 displayed in a web fashion in the portal.

14   Q.   Would the Lawson Transaction Manager be

15 interpreting those and displaying those to the

16 user, or would that be Java code doing that?

17   A.   I don't know if it's Java code but it's

18 not the Transaction Manager. That plays no part.

19 Transaction Manager handles the system resources as

20 we discussed yesterday.

21   Q.   I would like to talk now about category

22 search.

348

1   A.   Uh-huh.

2   Q.   It's possible in the RSS system to

3   search for an item by drilling down into different

4   categories, correct?

5   A.   Yeah.

6   Q.   Could you describe for me how that

7   happens at a source code level?

8   A.   I would have to look at some code to

9   know exactly.

10   Q.   Okay. Please do.

11   A.   Do you have RSS product code loaded

12 or -- I mean, conceptually I know what it's doing.

13 I don't know the exact program that's doing it

14 offhand.

15   Q.   Okay. I've got all of the source code

16 that's been produced on that computer. So I would

17 like to understand at a source code level how the

18 category search works.

19   A.   Can you point me to the RSS source code?

20 This isn't a standard Lawson -- I mean, this is not

21 my computer so I --

22   Q.   No, I understand. But that's what's

349

1   been produced, and you're Lawson's designated

2   witness on the source code. So everything is there

3   that you should need to answer the question.

4   MR. SCHULTZ: Well, you've loaded it.

5   He has not loaded it.

6   THE WITNESS: I don't know where

7   anything is.

8   MR. SCHULTZ: So he's asking you for

9   where it's located on the machine that you've

10 prepared for him.

11 BY MR. STEIN:

12   Q.   The Eclipse Project, I've been told, has

13 all of the code in it.

14   A.   I don't see source code for RSS. This

15 looks like the 4GL side of it.

16   Q.   Do you know the name of the particular

17 4GL routines that are involved in category search?

18   A.   No. That's what I was going to look

19 for. I believe it's one of the RQI programs.

20   Q.   Did you review any of the source code

21 prior to your deposition?

22   A.   Sure.

350

1   Q.   What did you do with respect to this

2   specific source code to prepare for your

3   deposition?

4   A.   Which source code?

5   Q.   The source code that's been produced in

6   this case.

7   A.   There are millions and millions of lines

8   of code here. I did not look at all of them.

9   Q.   What did you look at?

10   A.   I reviewed a couple of the topics that

11   were on the 30(b)(6).

12   Q.   Which topics did you review?

13   A.   I went through all of them.

14   Q.   Okay. So Topic 1, subtopic I reads:

15   "The source code routines associated with the

16   category search task."

17   A.   Yep.

18   Q.   What source code did you look at in

19   preparation for your deposition with respect to

20   that subtopic?

21   A.   As I stated, I don't remember the name

22   of the files, but I did review them.

351

1   Q.   Okay.

2   MR. SCHULTZ: Do you have the name of

3   the files?

4   MR. STEIN: No.

5   THE WITNESS: I said I can find them if

6   you show me -- I mean, if -- If I can get to RSS, I

7   can find them.

8   BY MR. STEIN:

9   Q.   I've been told that if you look in the

10   Apps 810 folder.

11   A.   Apps 810. But RSS is not part of the

12   Apps 810 I don't believe. This is 4GL code.

13   Q.   Could you go up to the top, please --

14   A.   Yep.

15   Q.   -- of the database tree. If you look

16   in -- okay.

17   If you look in either of the two

18   packages, 9011/installer, 9011/Java, is that what

19   you're looking for?

20   A.   Not there. I don't know what that is

21   even.

22   That looks like it there, yes.

352

1   Q.   Okay. So back to my question about how

2   the search --

3   A.   Well, hang on a second. This is the

4   Java code. I don't see the HTML JavaScript offhand

5   anyway.

6   Q.   Could you click on the green, not the

7   Package Explorer but the green --

8   A.   That one?

9   Q.   Yeah.

10   MR. STEIN: Let's take a break.

11   THE VIDEOGRAPHER: Going off the record.

12   The time is 10:41 a.m.

13   (Off-the-record discussion.)

14   THE VIDEOGRAPHER: Back on the record.

15   The time is 10:43 a.m.

16   BY MR. STEIN:

17   Q.   Okay. I think we've managed to locate

18   at least a window into what you need to look at.

19   So let me ask my question again.

20   A.   Yep.

21   Q.   Could you explain, please, how the

22   category search is accomplished in the RSS system.

353

1   A.   I'm going to refer back to the code here

2   to look.

3   Q.   And you've pulled up which file?

4   A.   Right now I've pulled up

5   reqCategories.js.

6   Q.   Okay.

7   A.   You don't have the application running

8   here, right?

9   Q.   No. Just the source code.

10   A.   I need to be able to search for

11   something, and I think it -- I don't know how to --

12   I don't want to search for a particular type there.

13   Q.   Let me ask you a different question.

14   A.   Yeah, I'm sorry.

15   Q.   Take a pause on that one for a minute.

16   A.   Yeah.

17   Q.   This might just implicate what you were

18   attempting to do. But is there -- Can you tell me

19   what the Lawson 4GL routines are that are involved

20   in a category search?

21   A.   I don't know off the top of my head. I

22   believe they're documented in one of the documents

354

1   we went over yesterday.

2   Q.   Do you remember which document it was?

3   A.   I do not. The RQ list, they all start

4   with RQI, A, B, C, F, H, G, I. Basically that's

5   what I was looking for as well.

6   Q.   Let's go back to the question before

7   about explaining to me at a source code level what

8   is happening with a category search.

9   A.   Okay. What would you like to see?

10   Q.   Where we start and where we end up.

11   A.   It's going to take me a little while

12   here because, for one thing, the search isn't

13   performing in the way it's set up in my Eclipse

14   environment. And there is no running application

15   or I could tell that way.

16   There we go, maybe.

17   Q.   What about the due category method in

18   reqCategories.js, it doesn't help us?

19   A.   This is after -- This is as you've

20   progressed through the category tree. Then if you

21   click on the items hyperlink, it will retrieve the

22   items for that particular hierarchy, I believe. I

356

1   have been what I was looking for, actually.

2   Q.   If you go to shoppingreturns.js.

3   A.   Okay.

4   Q.   Now, the due category function in the

5   shoppingreturns.js file, what does that do?

6   A.   This is -- This is what will display I

7   believe the available categories that you can

8   traverse through, the UNSPSC codes that have been

9   defined.

10   Q.   So if you click on the highest possible

11   category, this function will then display the

12   categories that are available to click on next?

13   A.   Correct.

14   Q.   Are the results formatted within XSL

15   stylesheet?

16   A.   I'd have to double-check, but that is

17   possible. It appears that way, yes.

18   Q.   Okay.

19   A.   Yeah.

20   Q.   Besides RQIC, are there any other Lawson

21   4GL routines involved in a category search?

22   A.   I don't believe so, no.

355

1   was looking for the steps prior to that as far as

2   traversing the category tree. But eventually it's

3   going to end up here into the due category, yes.

4   Q.   Due category item, that will return the

5   actual item detail, right?

6   A.   This will return the list of items for

7   within a particular category that you've selected.

8   Q.   The due category item or the due

9   category function?

10   A.   We're talking about the due category

11   item.

12   Q.   Okay. So the due category item will do

13   what?

14   A.   It looks like it will call the RQIC

15   program to return a list of items.

16   Q.   That match that particular category?

17   A.   Based on these UNSPSC segment, class and

18   commodity that I've highlighted there, yes.

19   Q.   The due category function, what does the

20   due category function do?

21   A.   Where do you see due category? I'm not

22   seeing that in this file anyway. Sorry. That may

357

1   Q.   Okay. Are you familiar with the term

2   ERP?

3   A.   Yeah.

4   Q.   Do you know what a data ERP call is?

5   A.   Data ERP? It's a servlet provided by

6   the environment level that will allow you to access

7   the database to retrieve data.

8   Q.   Can you tell me if the due category is a

9   data ERP call?

10   A.   I believe it is, yes.

11   Q.   Will the RSS system tell a user whether

12   a particular item is in stock?

13   A.   It will -- It will tell whether it's in

14   stock at their particular from location, yes. It

15   will indicate it.

16   Q.   The different types of items can be

17   either items that are in the local inventory or

18   items that are not on hand, right?

19   A.   They're designated as stock and

20   nonstock, yes.

21   Q.   And if it's a nonstock item, does the

22   RSS system determine whether there are any items in

358

1 inventory?

2   A.   Nonstock items are not tracked in

3 inventory.

4   Q.   But stock items are tracked in

5 inventory?

6   A.   Yes.

7   Q.   How does the RSS system determine

8 whether stock items are in inventory?

9   A.   Well, by nature, stock items are -- you

10 are tracking quantities of stock items.

11   Q.   So the system would know whether you

12 have five or zero of those left?

13   A.   There's some kind of an available

14 calculation, yes.

15   Q.   Where is the quantity of the item

16 stored, which table?

17   A.   I believe it's the item LOC table.

18   Q.   I would like to talk now about the

19 process of building a requisition in RSS.

20   A.   Uh-huh.

21   Q.   Can you describe how a requisition is

22 created inside the RSS system?

359

1   A.   It's kind of a broad topic. I mean, any

2 particular aspect?

3   Q.   Let me rephrase the question.

4   Once particular items have been selected

5 by the user, can you describe how a requisition is

6 created from the items that have already been

7 selected?

8   A.   We again make a transaction call

9 throughout -- through the LSF or ILS layer, the

10 environment layer, to another 4GL program that will

11 process them and add them to the database.

12   Q.   Can you tell me what Lawson 4GL programs

13 are involved in creating a requisition from items

14 that the user has selected?

15   A.   That would be RQIF.

16   Q.   Are there any other 4GL routines

17 involved besides RQIF?

18   A.   That is the driving program, yeah.

19   Q.   And could you briefly describe the logic

20 of the RQIF program?

21   A.   It's basically creating -- or it is

22 adding req line. It's a database table, req line

360

1 records, which are individual lines of a

2 requisition. It's creating them and populating the

3 database table with that information.

4   Q.   And once it does that, does it do

5 anything else?

6   A.   It depends on what process you're

7 performing from the RSS side.

8   Q.   What are the options as far as processes

9 from the RSS side?

10   A.   Save or check out or delete.

11   Q.   So if we were in the checkout case, what

12 else is RQIF going to do?

13   A.   It performs what Lawson terms a release

14 function, which basically signifies that you're

15 done with that requisition; you're sending it on

16 for processing or flagging it for processing.

17   Q.   Can you describe how the requisition

18 approval steps, if any, are implemented in the path

19 between checkout and purchase order generation?

20   A.   That's going to depend on the type of

21 approval that you're doing.

22   Q.   What types of approvals are available?

361

1   A.   We have a ProcessFlow approval product

2 or -- ProcessFlow is the product. There is an

3 approval process that they could use where the

4 client can dictate the steps necessary to approve a

5 requisition, and the approvals may not be necessary

6 depending on dollar amounts. You may not even

7 include the approval steps in your process. I

8 mean, it's client-determined procedures at that

9 point but...

10   Q.   Okay. So if an approval is required,

11 what, if any, Lawson 4GL routines are involved in

12 that approval?

13   A.   Again, it would depend on the approval

14 process you've designated. But I don't know the

15 exact routines, but the requisition is flagged

16 needing approval at release time. It would be a

17 status on that requisition. And until that

18 requisition has been approved based on the approval

19 process chosen by the client, it cannot be

20 processed further so... I mean, it's a status of

21 that requisition itself.

22   Q.   Is there a specific field in a table

362

1 that is flagged?

2   A.   Yes.

3   Q.   Do you know the name of that?

4   A.   I don't know the exact name, but

5 there's -- I believe it's on both the requisition

6 header and req -- req line --

7   Q.   Line?

8   A.   -- tables.

9   Yeah.

10   Q.   Does the RQIF logic create POINTERFAC

11 records?

12   A.   I don't think the logic is solely based

13 on RQIF. It's a common library someplace that --

14 it interacts with, though, but...

15   Q.   It's a common library called by RQIF?

16   A.   Yes, it would be. I mean, that would

17 have to happen after an approval.

18   Q.   If an approval is required, how does

19 RQIF get executed after the approval has been made?

20   A.   At that point it would not be executed

21 again. It would -- The release logic that RQIF

22 utilizes would set it into a "needs approval"

363

1 status and RQIF would be done at that point.

2   Further processing of the approval would

3 handle the additional processing after it was

4 approved.

5   Q.   In that case, would the further

6 processing create the PO interface records?

7   A.   Yes.

8   Q.   Can you identify any 4GL routines that

9 do that extra processing?

10   A.   I don't know what they are myself.

11   Q.   Where could we look to determine that

12 information?

13   A.   It's in the 4GL code. I would have to

14 ask somebody else at this point, a coworker or

15 something. I don't know personally the names of

16 the routines.

17   Q.   Is there anyone in particular that comes

18 to mind that might know the answer to that?

19   A.   The exact routine names? I don't know.

20 I mean, I would have to ask a few of my coworkers.

21   Q.   Okay. Is that information -- Do you

22 think you could obtain that information during a

364

1 break?

2   A.   There's a possibility. I would have to

3 contact them.

4   Q.   Okay. I just request that you make an

5 attempt to find that out on a break for us.

6   A.   Sure.

7   Q.   Thank you.

8   Is there a way to display or determine

9 which requisitions are needing approval if an

10 approval is required?

11   A.   There is an inquiry piece within

12 Requisition Self-Service. I mean, it's basically

13 reviewing your requisitions but... And I believe

14 they give you a status at the time you check out

15 that tells you whether it's waiting for approval.

16   Q.   Going back to the code that's actually

17 rendering the screens to the user, you didn't know

18 what code that was that actually rendered the

19 information to the user, right?

20   A.   Which screen, which information?

21   Q.   For example, PO100, something that's a

22 4GL screen.

365

1   A.   Yep.

2   Q.   Do you know what code is involved to

3 actually display that to the user?

4   A.   I have no clue what the names of

5 those -- Yeah, I don't even know what it's written

6 in. It's part of the environment. It depends on

7 if you're talking portal, character-based.

8   Q.   It's portal-based?

9   A.   It would be some portal code. I

10 don't -- you know, I have never seen the source

11 code. I don't know where that's kept.

12   Q.   Okay. Do you know if it's an automated

13 mapping from the 4GL screen to the portal screen?

14   A.   I'm not sure what you mean by "automated

15 mapping" but...

16   Q.   There is no -- and by that, I mean there

17 is no handwritten HTML, it's generated from the

18 Lawson 4GL screen itself?

19   A.   That's my understanding, yes.

20   MR. STEIN: Let's take a break.

21   THE VIDEOGRAPHER: This marks the end of

22 Volume 2, Tape No. 1, in the deposition of Todd

366

1   Dooner. Going off the record. The time is
2   11:08 a.m.
3   (A recess was then taken.)
4   THE VIDEOGRAPHER: Back on the record.
5   Here marks the beginning of Volume 1 -- excuse
6   me -- Volume 2, Tape No. 2, in the deposition of
7   Todd Dooner. The time is 11:28 a.m.
8   BY MR. STEIN:
9   Q.   Mr. Dooner, what we've done over the
10 break is we've brought in the demo computer that
11 has the Lawson environment running. And to the
12 extent that you need to refer to that box for
13 anything, just let us know that you're going to be
14 going in there, and then do your best to explain
15 what you're accessing on that machine, because we
16 don't have a display of the video from that
17 machine.
18   So in order to make sure that the record
19 is complete and accurate, I would ask you to just
20 kind of narrate what you're doing, and to the
21 extent that you forget or aren't, I will prompt you
22 to do so.

367

1   A.   I will.
2   Q.   Thank you.
3   Over the break, were you able to call
4   anyone back at Lawson to determine whether they had
5   information to answer the question that I posed?
6   A.   A message was left, but no response as
7   of yet.
8   Q.   Okay. And what did you ask?
9   A.   I asked to provide the routine or
10 library name that creates PO interface records.
11   Q.   Okay. Let's talk about generating
12 purchase orders now.
13   A.   Okay.
14   Q.   The RSS system will generate purchase
15 orders from requisitions; is that right?
16   A.   I wouldn't state it in those terms, no.
17   Q.   Okay. How would you state it?
18   A.   I would say that the PO interface record
19 is generated as a result of a -- could be generated
20 as a result of a requisition or nonstock items.
21   Q.   Okay. And is a PO interface record an
22 actual purchase order?

368

1   A.   No.
2   Q.   Okay. And so how do we get from the
3   step of PO interface record to a purchase order?
4   A.   There are PO programs that will then
5   attempt to turn the interface record into an actual
6   PO.
7   Q.   And what PO programs are involved in
8   that step?
9   A.   I believe there is a batch and an online
10 version. The batch version is PO100, and I believe
11 the online version is PO23.
12   Q.   What's the difference between the batch
13 and online version?
14   A.   The online version will process any POs
15 that contain all the necessary information to
16 generate the PO. That's kind of a semiautomated
17 job that can run at a client's given time frame.
18   The online version is -- I believe the
19 screen is called buyer review. If there are issues
20 with the information on the purchase order that
21 prevent it from being turned into a PO, the buyer
22 can go in and interact with it.

369

1   Q.   Can you describe the logic in the PO100
2   program in terms of actually generating purchase
3   orders?
4   A.   I -- I don't know much about what it is
5   actually performing as far as business logic other
6   than consuming the PO interface records and
7   generating --
8   Q.   Well, let me rephrase the question.
9   A.   Yeah.
10   Q.   By PO -- By logic, what I mean is the
11 logic of the source code itself, not necessarily
12 business logic. In my mind, business logic is
13 different from source code logic.
14   A.   Yeah.
15   Q.   Do you agree?
16   A.   Yeah.
17   Q.   Okay. So in terms of -- In terms of
18 source code logic, could you explain what PO100 is
19 doing?
20   A.   Again, that's a long drawn-out process.
21 I don't know all the steps involved again. It's
22 consuming PO interface records, and I'm sure it's

370

1 performing some edits and lookups and checks to

2 determine whether the information provided is

3 sufficient to create a PO.

4   And at that point it would create

5 additional records in the -- There is a purchase

6 order header and a PO line table that would get

7 created as a result of building that purchase

8 order.

9   Q.   Could you explain how PO100 reads PO

10 interface records and generates one or more

11 purchase orders based on those PO interface

12 records?

13   A.   I'm not sure. Can you rephrase that?

14   Q.   It's correct, is it not, that PO100

15 reads PO interface records, correct?

16   A.   Yes. That's my knowledge. That's my

17 understanding.

18   Q.   Do those PO interface records reference

19 requisition line items?

20   A.   I don't believe so. It's a separate

21 stand-alone file.

22   Q.   Do PO interface records relate at all to

371

1 req line items?

2   A.   I don't know offhand if there is a

3 relationship between those two tables. I could

4 look in dbdef to see if there is a relation.

5   Q.   Let's take a look at dbdef. So for the

6 record, you're now looking at the demo machine and

7 you're doing what?

8   A.   Well, I'm attempting to find a command

9 prompt so that I can launch dbdef. Where are we

10 here?

11   I don't see -- I guess I'm looking

12 for -- Do you know if Lawson LID is loaded, the

13 character-based desktop? I don't believe there is

14 a GUI version for dbdef.

15   I guess I'm unable to find --

16   Q.   You're not able to find what?

17   A.   Well, I need to get to a command prompt

18 within the virtual machine that's running here to

19 execute the environment commands, and I'm not sure

20 how to do that on this machine.

21   Q.   Let's just move on.

22   A.   Sure.

372

1   Q.   If a requisition consists of items from

2 different vendors, will the PO100 logic produce one

3 purchase order for each different vendor?

4   A.   Yes, I believe so.

5   Q.   Can you describe in any detail how PO100

6 does that?

7   A.   I really don't know.

8   Q.   You don't know.

9   You're aware that you're designated on

10 the source code routines involved in generating a

11 purchase order, right?

12   A.   Yes.

13   Q.   And you don't know how PO100 generates

14 different purchase orders for vendors based on

15 requisitions?

16   A.   I mean, conceptually in my head, but not

17 based on -- I don't have memorization of the

18 source code.

19   Q.   But you have the source code in front of

20 you, right?

21   A.   Sure.

22   Q.   Okay. And if you pull up PO100, could

373

1 you explain with that in front of you?

2   A.   I am not sure.

3   Q.   Let's try that.

4   So now you're looking at PO100?

5   A.   PD.

6   Q.   I'm sorry. PO100PD?

7   A.   Correct.

8   Q.   And the question is: How does the PO100

9 logic create one purchase order for each different

10 vendor for the items in Requisition?

11   A.   I mean, without stepping through the

12 program again and studying it for a while, I would

13 strictly be pulling bits and pieces out of the code

14 here.

15   Q.   You know, you've been designated on

16 this, and we would like to understand how PO100

17 does this. So whatever time you need to take to

18 answer the question, please do.

19   A.   Okay. I probably wouldn't do it this

20 way, because I don't know all the routines involved

21 here. This would take me -- to fully understand

22 what PO100 is doing, it will take me a couple of

374

1 days.

2   Q. Did you review PO100 in preparation for

3 your deposition?

4   A. Not in great detail, no. I mean, it

5 would be impossible to memorize what's happening.

6   Q. I don't think we asked you to memorize

7 what's happening.

8   A. Yeah.

9   Q. I just think -- What we're trying to get

10 and what we're entitled to is an understanding of

11 the facts of how this works. So if you can't

12 answer that question, then it's our position that

13 you are unprepared to answer that question and that

14 we would leave the deposition open for someone else

15 to come back and answer questions about how PO100

16 works.

17   MR. SCHULTZ: Just to clarify for the

18 record, are you referring to Topic No. 1(l)?

19   MR. STEIN: Yes, in this particular

20 instance.

21   MR. SCHULTZ: I would note for the

22 record that PO100 is not specifically called out in

375

1 Topic 1(l).

2   MR. STEIN: You don't dispute that PO100

3 is a source code routine involved in generating a

4 purchase order, correct?

5   MR. SCHULTZ: What I'm stating is that

6 PO100 is not specifically called out, and the

7 witness has testified that he can look through the

8 source code; however, that will take a long time.

9   MR. STEIN: Okay. And you wouldn't

10 dispute that we're entitled to that information,

11 right?

12   MR. SCHULTZ: You're entitled to have an

13 individual who is designated on the topic, and

14 Mr. Dooner is designated on this particular topic.

15   MR. STEIN: We're entitled to have an

16 individual designated on the topic that's

17 knowledgeable about the topic, and Mr. Dooner is

18 not knowledgeable about the topic, as far as

19 ePlus is concerned.

20   MR. SCHULTZ: Well, he has testified

21 that he can look through the routines and testify

22 on the subject areas. And it's your choice not to

376

1 continue asking him questions with respect to the

2 source code materials that are provided in front of

3 him.

4   MR. STEIN: I haven't refused to do

5 anything. I have asked Mr. Dooner a question.

6 He's responded that it would take a long time to do

7 so. And, you know, if he would like to be here for

8 the next three days to answer the question, then

9 that's probably what we're going to have to do.

10 BY MR. STEIN:

11   Q. So I'll pose the question again and

12 you'll take the time necessary to answer the

13 question.

14   So my question is to you, Mr. Dooner:

15 Could you explain to me how PO100 generates one

16 purchase order for each vendor that has items in a

17 particular requisition?

18   A. It creates multiple purchase order

19 header records and then attaches the appropriate

20 line records to the header for a designated vendor.

21   Q. Can you show us where in PO100 it does

22 that?

377

1   A. It's a -- PO100 is an entire -- PO100 is

2 PO100. It's not in one place. It's the entire

3 program. I mean, it's a process.

4   Q. Okay. So where in PO100 does it first

5 review the req line entries?

6   A. It does not do that.

7   Q. Okay. So how does it determine -- How

8 does PO100 determine how many purchase orders it's

9 going to need to create?

10   A. It reads the POINTERFAC records.

11   Q. Where is the first place that PO100

12 reads the POINTERFAC records?

13   A. I believe the first place it's reading

14 interface records is in the routine

15 1000-SEL-REPORT.

16   Q. And after it reads those records there,

17 what does it do next?

18   A. It calls another routine.

19   Q. Are you looking for the name of that

20 routine now?

21   A. Yeah.

22   Q. Okay.

378

1   A.   I don't see it as part of this -- as

2   part of PO100PD.

3   Q.   Let me ask you a different question and

4   you can just pause that effort for a minute.

5   Can you describe what is meant by a

6   blanket POINTERFAC record?

7   A.   A blanket? A blanket, to my knowledge,

8   is a type of purchase order.

9   Q.   What other types of purchase orders are

10   there if they're not blankets?

11   A.   I don't know offhand.

12   Q.   If you go down to 1000-SEL-REPORT

13   routine in PO100. 1000.

14   A.   SEL-REPORT.

15   Q.   Okay. And then if you scroll down until

16   you see 143822 on the left-hand side.

17   A.   Yeah.

18   Q.   Sorry. Keep scrolling down.

19   Actually, yeah, please go to

20   1020-SELECT-BLKT.

21   A.   Whole word select or --

22   Q.   No. Yes, yes, yes, I'm sorry.

380

1   A.   I didn't explain because I wasn't quite

2   sure of the definition. I would be referring to

3   the help text or something for the definition at

4   this point.

5   Q.   Okay. Is there somewhere in particular

6   we could look to determine what that means in this

7   context?

8   Let me ask you this: Is blanket a cost

9   code?

10   A.   No. My understanding, it's a type of

11   purchase order, a blanket PO. I don't know the

12   definition of that.

13   Q.   Okay. Let's talk for a minute about

14   punchout.

15   A.   Okay.

16   Q.   What, if any, 4GL routines are involved

17   in punchout?

18   A.   There are no 4GL -- Well, there are some

19   4GL routines to set up the -- some of the punchout

20   vendors, part of the ED system I believe it is.

21   **Q.   But once the punchout vendors are set**

22   **up, are there any 4GL routines that are involved in**

379

1   A.   BKT?

2   Q.   BLKT.

3   A.   BLKT.

4   Q.   Go to that routine.

5   A.   Yes.

6   Q.   What is this routine doing, the

7   SELECT-BLKT-PIF-RECS?

8   A.   I believe it's -- It appears to be

9   building a -- reading PO interface records and

10   trying to filter out based on the parameters that

11   were provided on the PO100 interface.

12   You can process individual vendors at a

13   time, that type of thing, whatever the parameters

14   on PO100, and I believe it's creating a work file

15   of those records that it will then continue

16   processing.

17   Q.   So I would like to go back for a second

18   to this blanket term.

19   A.   Yeah.

20   Q.   Could you explain what again that --

21   what you said before that it means, blanket, in

22   this context?

381

1   **shopping at a punchout vendor?**

2   **A.   No. You are -- You are on that vendor's**

3   **site once you begin the shopping process. That's**

4   **outside of Lawson at that point.**

5   Q.   Okay. So if you were to select a

6   particular item at a punchout vendor, it would make

7   its way back to the Lawson system, correct?

8   A.   Yeah. Once you go through the vendor's

9   designated checkout process, yes.

10   Q.   And once it's sent back to the Lawson

11   system, that will show up in -- as a requisition

12   line item just like normal, right?

13   A.   Correct.

14   Q.   And then from there it's the same

15   process that we've previously discussed for taking

16   requisition and doing approvals if necessary, if

17   required, and then eventually building purchase

18   orders?

19   A.   Correct.

20   Q.   Okay.

21   MR. STEIN: Let's take a lunch, shortish

22   lunch break, and then I think I can come back after

382

1   lunch and wrap up.

2   THE VIDEOGRAPHER: Going off the record.

3   The time is 11:58 a.m.

4   (A recess was then taken.)

5   THE VIDEOGRAPHER: Back on the record.

6   The time is 12:40 p.m.

7   BY MR. STEIN:

8   Q.   Mr. Dooner, I would like to talk again

9   for a minute about the price information.

10   A.   Okay.

11   Q.   And I believe you had mentioned earlier

12   that you might have needed to look at the dbdef to

13   find out where the price information was stored.

14   Do you remember that?

15   A.   Not exactly, no.

16   Q.   Okay. If I were to ask you where the

17   price information is stored in the database for a

18   particular item, would you be able to tell me where

19   that is?

20   A.   I'm not sure that's stored in an exact

21   database field. I think it can be derived as well

22   based on last PO cost and that type of a thing.

383

1   Q.   So if I do a search for a particular

2   item and that item is returned to me as a hit of

3   that keyword search --

4   A.   Right.

5   Q.   -- it has a price associated with it,

6   right?

7   A.   Yes.

8   Q.   How does the RSS system provide that

9   price information to the user?

10   A.   I believe there's a common routine that

11   RQIC accesses, a pricing routine, that gathers that

12   information at search time.

13   Q.   And would you be able to show us at

14   least where that pricing routine begins in RQIC?

15   A.   Well, I don't believe it's part of RQIC.

16   I think it's shared between requisitions 4GL and

17   RSS as well. I don't know the name of it offhand;

18   I don't know the library name.

19   Q.   And that routine wouldn't be called by

20   RQIC?

21   A.   It would be called, yeah, referenced and

22   used by RQIC, yes.

384

1   Q.   Would you be able to look through RQIC

2   to see what that particular routine is called?

3   A.   I can try, yeah.

4   Q.   Okay. Please do so.

5   A.   I don't know if it's exactly in the

6   RQICPD. Actually, there's not much, if I remember,

7   in the PD itself.

8   The PD, it's calling other routines, I

9   think, which we determined earlier was this

10   RQGILXMLPD. And I don't know for a fact if it's in

11   here.

12   This section I've high -- This section

13   here that I've highlighted is actually passing the

14   cost that was derived earlier, which I will look

15   for but -- and populating an XML node that will be

16   output via RQIC.

17   Q.   Is that approximately line 1995 that

18   you're on?

19   A.   It starts on 1995, correct.

20   Q.   Okay. And what is the section of code

21   starting at 1995 doing?

22   A.   This is -- This paragraph is producing

385

1   or in the process of producing or building the XML

2   output file that RQIC produces that is later

3   consumed by RSS.

4   Q.   Okay. And so how does the pricing

5   information -- That's a variable?

6   A.   Yeah. That got populated somehow. I'm

7   assuming it's another routine. Where was that

8   populated? RQDT. I believe it's another routine

9   just based on the name of the working storage

10   variable. I don't know the exact name offhand.

11   Q.   That's the --

12   A.   Oops, sorry.

13   Q.   So what you're clicking there, that's

14   the variable in which the actual price of the item

15   is stored?

16   A.   Yes.

17   Q.   Okay. And so now the question is: What

18   populates that variable?

19   A.   Yes.

20   Q.   Okay. And where can we go to look to

21   see where that variable is populated?

22   A.   Well, that's the RQ.

386

1   Q.   Now you're in the -- Which file are you

2 in?

3   A.   I'm in a routine labeled RQDETSCUPD.

4   Q.   Okay.

5   A.   And the description describes

6 procedures -- a procedure description for

7 determining the source, cost and UM that will be

8 used to build the line entry screen, parentheses,

9 item list XML document.

10   Q.   Okay. And so you think that the

11 variable that we just talked about might be

12 populated here in the --

13   A.   Yes.

14   Q.   Okay.

15   A.   Any particular question? I mean,

16 there's quite a bit of code here.

17   Q.   I'm just trying to understand how that

18 item price gets displayed to the user. And if it's

19 not stored in the database somewhere that this item

20 costs this much, how does the RSS system figure

21 that out?

22   A.   I mean, it's based on this -- this set

387

1 of business logic here that --

2   Q.   And the logic is in the file name that

3 you --

4   A.   Yes.

5   Q.   -- previously said?

6   A.   Yes. Depending on the item type and

7 whether it's on a contract. And I guess I'm not

8 sure of all the actual possibilities that would

9 determine without stepping through line by line and

10 trying to understand it.

11   Q.   Okay.

12   A.   But this is the routine that determines

13 it.

14   Q.   That is the routine that determines --

15   A.   Yes.

16   Q.   So basically this is the routine that

17 determines the price that ends up in the XML file

18 which is used to display to the user when a search

19 is made and hits are found?

20   A.   Correct.

21   Q.   Okay. I would like to go back and talk

22 about the workflow and the approval workflow.

388

1   A.   Yeah.

2   Q.   And I think when we came back after a

3 break and you had called someone back at Lawson to

4 inquire into this, you mentioned libraries. And I

5 think the question that you might have posed to

6 Lawson might have been a little bit too down in the

7 weeds. And I'm asking more for -- I'm asking for

8 the 4GL like --

9   A.   The token?

10   Q.   Yeah. Or the -- Not necessarily the API

11 calls that are made to do the approval, but where

12 in a 4GL program will the approval actually take

13 place?

14   Does that make sense? What 4GL programs

15 are involved in the approval?

16   A.   I don't believe that was the question we

17 posed back to corporate but...

18   Q.   That's what I'm trying to figure out.

19 Because that's the question I thought I had asked

20 before, and then when I heard that back, I think

21 there might be a miscommunication.

22   A.   Okay. Again, there are approval options

389

1 that the client can choose. The simplest is a -- I

2 believe it's RQ13. It's an approval screen that

3 allows --

4   Let's see. I can bring up the screen.

5 It might... Where are we here? That's not the

6 screen I was thinking of. Where's the approval

7 screen?

8   Yeah, this is the review, I believe.

9   There is a screen where you can define

10 the limits of a requisition, and I believe we give

11 you five or six levels. You find a dollar amount

12 and then who is responsible for approving that at

13 each level. That's a setup screen that's done

14 initially.

15   Q.   Does that have an RQ number?

16   A.   Yeah. And I don't recall it offhand.

17   Q.   Would it help if you looked at the demo

18 machine?

19   A.   That's a good point. Thanks.

20   Uh-oh. Did we lose our Lawson session

21 here? I think we either lost our connection or the

22 virtual machine went down.

390

1   MR. STEIN: Let's take a break.

2   THE VIDEOGRAPHER: Going off the record.

3 The time is 12:57 p.m.

4   (Off-the-record discussion.)

5   THE VIDEOGRAPHER: Back on the record.

6 The time is 12:57 p.m.

7   THE WITNESS: I am looking at the laptop

8 here in the Lawson Smart Office trying to determine

9 the RQ program that is used to define the approval

10 hierarchies within Requisitions.

11   Great. "Lawson Smart Office has

12 encountered a problem." I can attempt to restart.

13   MR. STEIN: Let's take a break again and

14 I'm going to try and short-circuit something.

15   THE VIDEOGRAPHER: Going off the record.

16 The time is 12:59 p.m.

17   (Off-the-record discussion.)

18   THE VIDEOGRAPHER: Back on the record.

19 The time is 1:03 p.m.

20 BY MR. STEIN:

21   Q.   Okay, Mr. Dooner, what we've done over

22 the break is we've created a requisition for a

391

1 monitor. And we did that, and then we switched to

2 the manager in-basket in the demo system here.

3   A.   Yes.

4   Q.   And there is now a page on the screen

5 that lists the requisitions that need approval.

6   And my first question to you is: What

7 4GL routines, if any, are involved in generating

8 the list of requisitions that need to be approved

9 by the manager?

10   A.   What you have brought up here is part of

11 the ProcessFlow approval process. It's a separate

12 product that Lawson sells.

13   The requisitions themselves are

14 obviously created through the 4GL system or

15 Requisition Self-Service but the act of bringing

16 them up in here was done via the 4GL applications

17 creating what we term as a work unit in a -- it's

18 outside, I believe, of the current Lawson database,

19 but it's a unit in another database that the

20 Workflow application accesses.

21   Q.   So the Workflow is another application

22 just like the Requistion Self-Service is an

392

1 application?

2   A.   Yeah, it's not tied directly to

3 Requisitions but it's another product offering from

4 Lawson.

5   Q.   Okay. So there are no Requistion

6 Self-Service 4GL routines that are involved in

7 generating this list of requisitions that need

8 approval that we see here on the demo machine?

9   A.   The only routine that I would say is --

10 Someplace there is a way to create a work unit.

11 And I believe that's a routine provided by the

12 environment level that would be called from the

13 4GL.

14   Q.   But a keyword word there to try and

15 uncover more information about that is work unit?

16   A.   Yes. I mean, you can see the list of

17 numbers here that are identified as work unit by

18 the heading.

19   Q.   Okay. Does the Workflow application

20 also utilize 4GL routines of its own?

21   A.   No. Well, the idea behind workflow is

22 that the -- Let me start over.

393

1   I believe we deliver a standard approval

2 process in Workflow. I am not 100 percent sure on

3 that.

4   Other than that, clients can create

5 their own Workflow. We have a tool, a designer

6 tool, that allows them to build a web of decisions

7 that need to be made on a requisition, and that's

8 done within Workflow. And the maintenance of any

9 flow in Workflow is done with that tool.

10   Q.   The approval that we see here attempting

11 to be accomplished on the demo machine, is that

12 something that comes standard with the RSS module?

13   A.   I guess I wouldn't know based just on a

14 list. The list wouldn't change. It's what happens

15 once you clicked on the flow, you now, who is next

16 in the chain, whether we e-mail somebody, do we

17 send it to multiple people.

18   Q.   Would it be helpful to click on one and

19 follow that through to the end to determine whether

20 it's part of the standard offering or not?

21   A.   I don't think that would tell me

22 because it -- I mean, you're looking at a snapshot

394

1 of an individual's work to do, and I don't know

2 where the next succeeding step would take place.

3   Q.   Okay.

4   MR. STEIN: Then, Will, I guess this is

5 a question for you. I just want to make sure that

6 we have the source code for this functionality if

7 it's not -- From what I'm getting from the witness,

8 it seems like it's not part of the RSS, and I just

9 want to understand whether we do or do not have the

10 source code for this approval portion.

11   MR. SCHULTZ: And just to clarify for

12 the record, then, we're talking about the

13 ProcessFlow and Workflow?

14 BY MR. STEIN:

15   Q.   The Workflow application, right?

16   A.   My interpretation would be the standard

17 Workflow approval process, which I assume this

18 would be. It's not a client load.

19   Q.   Okay. If you could click the first

20 link.

21   A.   Which one?

22   Q.   The first one listed.

395

1   A.   Click the requisition itself?

2   Q.   Yeah.

3   A.   Where the cursor is?

4   Q.   Yeah.

5   A.   Clicking on requisition --

6   Q.   Actually, click on the last link.

7   A.   Okay.

8   Q.   The one that we just created.

9   A.   Work Unit 236, Requisition 865.

10   Q.   Okay. Now, does that information

11 displayed on that screen, does that tell you any

12 more about whether this would be part of the

13 standard approval Workflow or not?

14   A.   To my knowledge, no, it does not.

15   Q.   Okay.

16   MR. STEIN: So, Will, I'd just ask if we

17 could confirm whether --

18   MR. SCHULTZ: Yeah.

19   MR. STEIN: -- we have the source code

20 for this nonstandard Workflow.

21   THE WITNESS: It would be the flow

22 itself. It would be a process-type file.

396

1   MR. SCHULTZ: Okay. Can we go off the

2 record for a couple of minutes.

3   MR. STEIN: Yeah.

4   THE VIDEOGRAPHER: Going off the record.

5 The time is 1:09 p.m.

6   (Off-the-record discussion.)

7   THE VIDEOGRAPHER: Back on the record.

8 The time is 1:14 p.m.

9 BY MR. STEIN:

10   Q.   We had a brief off-the-record

11 discussion, and we talked about my request of

12 Lawson, and I think we're all on the same page now.

13   So what I'm going to do is I'm just

14 going to basically go back through what we talked

15 about and make sure that it's on the record this

16 time.

17   A.   Okay.

18   Q.   So we've been talking about the screens

19 that are displayed in the approval Workflow on the

20 demo machine, correct?

21   A.   Correct.

22   Q.   And one of my questions was what

397

1 determines the screens that are displayed to the

2 user in this approval process. And you told me

3 that it was a flow file; is that correct?

4   A.   Yeah. A process flow that -- I believe

5 we deliver a standard approval process to clients

6 that is executed within ProcessFlow.

7   Q.   And the flow that we're seeing here on

8 the demo machine, is that the standard flow, or is

9 that a different flow, to your knowledge?

10   A.   I don't know. My guess would be it

11 would be the standard flow if we've given you a

12 base version of our code.

13   Q.   Okay. And how are we able to see what

14 that flow is?

15   A.   Lawson sells a ProcessFlow product that

16 will interpret the flow files and display them

17 graphically to you.

18   Q.   And the flow file is an FLO extension?

19   A.   I believe that is correct.

20   Q.   And so if we were to use this Lawson

21 tool to view a flow file, what would we see on the

22 screen?

398

1   A.   It would be a graphical representation

2   of the delivered approval process.

3   Q.   And as far as the function of changing

4   the status of a particular item or a particular

5   requisition from needs approval to some other

6   status, how can we determine what is responsible

7   for doing that?

8   A.   I don't know offhand. I would -- My

9   approach would be to look at the flow to see what

10   it is initiating during the approve -- clicking the

11   approve button on a particular requisition line or

12   requisition.

13   Q.   And if that information wasn't available

14   in the flow display, is there anywhere else that

15   you would look?

16   A.   Well, it's going to have to be initiated

17   from the flow, so I mean that would be my first

18   step to determine what it's interacting with. I

19   would think that would be present there.

20   MR. STEIN: And, Will, just to recap

21   kind of our discussion, we'll go back in and search

22   for flow files. To the extent that we can't find

399

1   any flow files, we can talk about that when the

2   time comes. So we'll just cross that bridge later

3   after we do an additional search.

4   BY MR. STEIN:

5   Q.   Is it possible, can you locate a flow

6   file on the demo machine quickly somehow?

7   A.   I can just attempt to -- Well, I think

8   if you launched the -- and I'm not sure how to do

9   it exactly -- the process flow designer, I believe

10   it will give you the capability to modify the

11   delivered flows. Because you're going to have to

12   plug in some information into the standard flow.

13   Q.   Okay.

14   A.   It would have a list of those flows that

15   are delivered by Lawson.

16   Q.   Okay.

17   MR. STEIN: So we'll go back in and

18   we'll check, and then you and I will talk if we

19   can't find something.

20   MR. SCHULTZ: Okay.

21   Do you have any additional questions for

22   this witness with respect to the flow? Is that

400

1   something that we need to find now as part of the

2   deposition?

3   MR. STEIN: Hold on one second.

4   BY MR. STEIN:

5   Q.   So we have these flow files, and those

6   are interpreted by a particular application,

7   correct?

8   A.   Yes.

9   Q.   And the name of that application is

10   what, again?

11   A.   I believe it's ProcessFlow Designer.

12   Q.   Is there -- Can you look to see if

13   ProcessFlow Designer is on the demo machine

14   somehow?

15   A.   I can look. I'm not sure how it's

16   actually launched. I'm trying to remember how it's

17   launched.

18   Actually, I believe it is a client side

19   application that is downloaded and loaded on an

20   individual PC. It doesn't sit on the server. I'm

21   not sure if that's been loaded onto this machine or

22   not.

401

1   Q.   So am I correct in that a client could

2   use the designer to create their own approval flow?

3   A.   Yes. They need to purchase a designer

4   to create their own flows, but I believe that we

5   allow them to modify the delivered flows, standard

6   flows.

7   Q.   And so the delivered flows, the Designer

8   application is not the application that's actually

9   executing the flow, correct?

10   A.   Right. Yeah.

11   Q.   Okay. What is executing the designed

12   flow?

13   A.   There is a -- There is a server

14   programmer environment that runs. I mean, it's a

15   service that -- a program that runs on the server

16   that deals with the flows.

17   Q.   Does that have a name?

18   A.   You know, I just would call it

19   ProcessFlow. I don't know the individual name of

20   the components, I guess, behind the scenes.

21   Q.   Is that server application that executes

22   the flows, is that part of RSS?

402

1   A.   No. It's a stand-alone product.

2   MR. STEIN: I'd just request that -- we

3   will go -- We'll go back in and try and confirm

4   whether we have the code for the stand-alone

5   application that executes the flow. But if you

6   could also determine whether we've been provided

7   with the source code that executes these flow

8   files, I think that's what we're looking for.

9   MR. SCHULTZ: I'll go back and look. My

10 understanding is you've been provided all of the

11 source code that relate to this product.

12   MR. STEIN: Okay.

13   THE WITNESS: Well, just based on what

14 we brought up here -- I mean, I believe we're

15 executing the flows at this point. I mean, the

16 question is, do you have the Designer loaded so

17 that you can actually interact with the flows

18 outside of the application.

19 BY MR. STEIN:

20   Q.   Well, I guess my question is what I mean

21 by do we have the source code is, is it on that

22 machine and not on -- because I understand it on

403

1   the demo machine.

2   MR. SCHULTZ: I understand what you

3   mean. You're talking about the source code in the

4   source code files.

5   MR. STEIN: Yeah.

6   MR. SCHULTZ: My understanding is that

7   has been produced, but I will go back and confirm

8   that.

9   MR. STEIN: Okay. And we will go back

10 and look as well, and we'll talk offline to resolve

11 it.

12   MR. SCHULTZ: Did you have any

13 additional questions for this witness with respect

14 to that issue?

15   MR. STEIN: Not at this time, no.

16 BY MR. STEIN:

17   Q.   I would like to now talk about the

18 associated items program, IC13.1. Are you familiar

19 with that?

20   A.   Somewhat, yeah.

21   Q.   Could you describe what the purpose of

22 the associated items program is?

404

1   A.   Do you mind if I bring it up?

2   Q.   Please.

3   A.   All right, I've got it up.

4   Q.   Okay. Could you describe what this

5   program is used for? And by "this," I mean the

6   IC13.1 associated items program.

7   A.   It's basically to associate additional

8   items that could be used as substitutes for the

9   specified item.

10   Q.   And is that if one of the normal items

11 is out of stock, that one of these substitute items

12 would be provided to the user?

13   A.   Yeah. I believe that's the intention,

14 yes. It's used mainly from -- I believe it's used

15 from the order entry side, as if you were selling a

16 product. If your business was to sell goods and if

17 you didn't have it, you could substitute this as a

18 replacement -- or substitute for the item that was

19 originally ordered.

20   Q.   Okay. Are you familiar with files with

21 the extension TBL?

22   A.   I am not. Without looking at one, I

405

1   mean, I...

2   Q.   On the source code computer, could you

3   hit Control Shift R. Type in itemmast.

4   A.   Yep, I see it. .TBL?

5   Q.   Yeah. And if we just pull up this first

6   hit, just itemmast.tbl. Can you tell me what the

7   purpose of this file is?

8   A.   I have never seen this file before. I

9   don't know if -- I don't know its purpose.

10   Q.   Is there someone back at Lawson that you

11 could call to ask about what these TBL extension

12 files are?

13   A.   Yeah, I would have to find somebody back

14 at corporate. Yeah.

15   MR. STEIN: I would just request that

16 you do that. So if we want to take a break to do

17 that.

18   MR. SCHULTZ: Let's do that.

19   THE VIDEOGRAPHER: Going off the record.

20 The time is 1:26 p.m.

21   (A recess was then taken.)

22   THE VIDEOGRAPHER: Back on the record.

Dooner, Todd -Vol. 2, VGA 3/2/2010 12:00:00 AM

406

1   The time is 1:48 p.m.

2   BY MR. STEIN:

3   Q.   Over the break were you able to

4   determine -- speak to someone and figure out what

5   the TBL files are?

6   A.   I believe so. I spoke to a coworker.

7   My understanding, and this was explained to me, is

8   that it's metadata for the database tables that

9   Lawson delivers to clients that get consumed during

10   the install process based on the applications they

11   buy to populate our utilities, the database that

12   the utilities uses, like dbdef, with the database

13   file layouts and fields and that type of thing.

14   Q.   So the way I understand that is it's

15   used to educate those utilities of how the database

16   is structured?

17   A.   Yeah.

18   Q.   I would like for you to take and put

19   Exhibit 12 in front of you. Directing your

20   attention to L0043347.034.

21   A.   Page 034?

22   Q.   Yes.

408

1   an item number, yes.

2   MR. STEIN: I have no further questions

3   for Mr. Dooner. I appreciate his time in answering

4   my questions.

5   MR. SCHULTZ: I would just like to

6   clarify for the record. There was one point in the

7   deposition where you had made an objection that

8   Mr. Dooner was not the person -- or did not have

9   enough knowledge to answer Topic 1(l).

10   I just want to confirm that's the only

11   objection that was made with respect to the topic

12   areas that were covered first.

13   MR. STEIN: Yeah.

14   MR. SCHULTZ: And then you also asked

15   him some additional follow-up questions that seemed

16   to resolve the objection. I am just asking you to

17   withdraw the objection.

18   MR. STEIN: I withdraw the objection.

19   MR. SCHULTZ: Okay. No questions.

20   THE VIDEOGRAPHER: Here marks the end of

21   Volume 2, Videotape No. 2 in the deposition of Todd

22   Dooner. Going off the record. The time is

407

1   A.   Okay.

2   Q.   This is the file format for a CSV file

3   for vendor price area, right?

4   A.   Correct.

5   Q.   Okay. Directing your attention to the

6   chart on page 34 here of Exhibit 12, to the row

7   that has position 68 through 86 and is field named

8   "Base Cost."

9   Do you see that?

10   A.   Yes.

11   Q.   Is that the base cost of the item?

12   A.   That is the base cost that the vendor

13   has supplied for an agreement that you have with

14   that vendor, yes.

15   Q.   Where in the database in RSS is that

16   base cost information being stored?

17   A.   There is a vendor agreement table. I

18   don't know the exact name offhand, but there is a

19   separate table that stores the vendor agreements

20   and their lines.

21   Q.   And that relates to the item number?

22   A.   It relates to a vendor item number and

409

1   1:52 p.m.

2   (Whereupon, the deposition was concluded at

3   1:52 p.m.)

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Dooner, Todd -Vol. 2, VGA 3/2/2010 12:00:00 AM

410

1   WITNESS CERTIFICATE

2

3   I, TODD DOONER, have read or have had the

4 foregoing testimony read to me and hereby certify that

5 it is a true and correct transcription of my testimony

6 with the exception of any attached corrections or

7 changes.

8

9   _____

10   TODD DOONER

11 [ ] No corrections

12 [ ] Correction sheet(s) enclosed

13

14   SUBSCRIBED AND SWORN TO BEFORE ME, the

15 undersigned authority, by the witness, TODD DOONER, on

16 this the _____ day of _____, _____.

17

18   _____

19   NOTARY PUBLIC IN AND FOR

20   THE STATE OF _____

21 My Commission Expires: _____

22

411

1   REPORTER'S CERTIFICATE

2

3   I, the undersigned Registered Professional

4 Reporter and Notary Public, do hereby certify that

5 TODD DOONER, after having been first duly sworn by

6 me to testify to the truth, did testify as set forth

7 in the foregoing pages, that the testimony was

8 reported by me in stenotype and transcribed under my

9 personal direction and supervision, and is a true

10 and correct transcript.

11   I further certify that I am not of

12 counsel, not related to counsel or the parties

13 hereto, and not in any way interested in the outcome

14 of this matter.

15   SUBSCRIBED AND SWORN TO under my hand and

16 seal this 8th day of March, 2010.

17

18   _____

19 JOHN L. HARMONSON, RPR

.   Notary Public in and for

20 the District of Columbia

.   My Commission Expires: 10/14/2010

21

22

412

1   CHANGES AND SIGNATURE

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1   CHANGES AND SIGNATURE

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

PLAINTIFF *e*PLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS AND REVISED SUMMARY OF THE DEPOSITION OF TODD DOONER, TAKEN MARCH 1, 2010

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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